

REPORT

# **Confirmatory Performance Testing of a Rotary Kiln Incinerator Exhaust**

**General Dynamics Ordnance and Tactical Systems  
Munition Services  
Carthage, Missouri**

January 2014

RCRA



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**GENERAL DYNAMICS**  
Ordnance and Tactical Systems  
Munition Services

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Enforcement Section  
MDNR Air Pollution Control Program  
205 Jefferson Street, P.O. Box 176  
Jefferson City, MO 65102

7282 Flint Hill Road  
New Tripoli, PA 18066  
Tel (610)-298-3085  
Fax (610)-298-4652

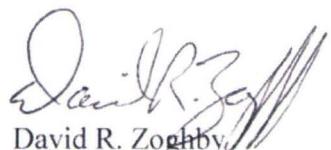
Re: CFPT Report and Notice of Compliance

EBV Explosive Environmental Company dba General Dynamics Ordnance and Tactical Systems Munition Services (GD-OTS MS) is submitting the Notice of Compliance and the Report for the Confirmatory Performance Test completed the week of November 18, 2013.

GD-OTS MS is in compliance with all operating parameters and emission.

Please contact me if you have any questions.

Sincerely,

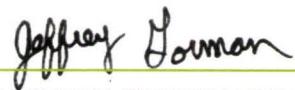


David R. Zoghby  
Senior Director of Marketing  
& Commercial Contracts

cc: Don Murphy, MDNR APCP  
Ken Herstowski, EPA Region 7  
EPA Region 7  
Joplin Public Library

# Confirmatory Performance Testing of a Rotary Kiln Incinerator Exhaust

General Dynamics Ordnance and Tactical Systems  
Munition Services  
Carthage, Missouri



JEFF GORMAN, PROJECT MANAGER  
AUTHOR  
O'Brien & Gere Engineers, Inc.



DAVID OSTASZEWSKI, P.E., SENIOR MANAGING ENGINEER  
REVIEWER  
O'Brien & Gere Engineers, Inc.

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## 1. INTRODUCTION

### 1.1 TEST PROGRAM SUMMARY

O'Brien & Gere was retained by General Dynamics Ordnance and Tactical Systems Munition Services (GD-OTS MS) to conduct a Confirmatory Performance Test (CFPT) for the Hazardous Waste Incinerators at their facility located in Joplin, Missouri. The purpose of the test program was to satisfy the applicable requirements under 40 CFR § 63.1207 of the Hazardous Waste Combustor (HWC) National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations.

The confirmatory testing was conducted during the week of November 18, 2013. The field program was conducted in accordance with the CFPT Plan approved by the Missouri Department of Natural Resources (MoDNR) and under their oversight during the field testing program. Mr. Dave Zoghby was present to coordinate process operations with the test program and collect process data.

The results from this testing indicate that emissions for dioxins and furans (PCDDs/PCDFs) met the applicable emission standards under 40 CFR 63 Subpart EEE (otherwise known as the HWC MACT regulations). A summary of the test results can be found in Section 3 of this report.

### 1.2 EMISSIONS TESTING PROGRAM PARTICIPANTS

#### Facility

Name: GD-OTS Munition Services

Address: 4174 County Road 180  
Carthage, MO 64836

Contact: Mr. David Zoghby

Telephone number: (610)-298-3085

#### Source Emission Testing Company

Name: O'Brien & Gere Engineers, Inc.

Address: 7600 Morgan Rd.  
Liverpool, NY 13090

Contact: Mr. Jeff Gorman

Telephone number: (315) 956-6022

#### Laboratory

Name: Maxxam Analytics, Inc.

Address: 6740 Campobello Road  
Mississauga, ON L5N 2L8

Contact: Mike Challis, Lab Manager

Number: (905) 817-5790

## 1.2 INCINERATOR OVERVIEW

The main components of the GD-OTS MS explosive waste incineration operation consist of feed preparation and handling systems, feed conveying systems, a Rotary Kiln (RKI) Incinerator and a Car Bottom Furnace (CBF) incinerator, air pollution control equipment, metals and ash handling systems, and plant support systems.

The RKI is designed to incinerate explosive devices including configured munitions and bulk explosives. The CBF is used to treat and/or decontaminate large-shaped metal pieces, and for the incineration of explosive contaminated trash, such as rags, soiled uniforms, and packing material. Each incinerator has its own waste feeding system with the CBF using a mobile floor for batch feeding while the RKI uses a Continuous Feed System. Dual induced draft fans pull exhaust gases from the kiln and car bottom furnace into a common natural gas-fired horizontal secondary combustion chamber and two-stage air pollution control system (APCS).

The APCS consists of a spray dryer where a premixed soda ash solution is injected for the neutralization of acid gases and baghouses with jet pulse cleaning systems. The entire incineration system is maintained under a negative pressure by the dual induced draft fans located at the discharge end of the APCS, which, in turn, exhausts cleaned process gases to the atmosphere via a 65 meter (213.3 feet) tall stack. Residue from the combustion process is separated into ash and recyclable metals and is collected in bins. GD-OTS MS recycles the metals and the ash is sent to an EPA-approved hazardous waste landfill for disposal. All recyclable metals are inspected prior to being sent to a recycling center.

The process is monitored and controlled by a distributive control system (DCS) capable of continuously monitoring the process to assure all operational parameters are within regulatory and permit limits while waste is being fed to either unit. The DCS operates on an Uninterruptible Power Supply (UPS) in the event of commercial electrical power failure. In addition, this incinerator system is equipped with a Continuous Emissions Monitoring System (CEMS) that continuously samples the exhaust gases for percent oxygen, percent carbon monoxide, total hydrocarbons concentrations, opacity, stack flow rate and stack temperature.

## 1.3 PURPOSE AND OBJECTIVES OF THE CFPT

The purpose of the CFPT was to demonstrate the incinerator is in compliance with the requirements in 40 CFR Part 63, Subpart EEE. To this end, the specific objectives of this CFPT were to:

- » Demonstrate compliance with the dioxin/furan emission standard of  $\leq 0.40 \text{ ng/dscm} @ 7\% \text{ O}_2 \text{ TEQ basis}$  (40 CFR § 63.1219(a)(1)(ii)) while the incinerator operates under normal conditions.
- » Conduct a performance evaluation of the Continuous Monitoring Systems (CMS) required for compliance with the dioxin/furan standard (40 CFR § 63.1209 (k)).

The CFPT included feeding a variety of waste materials to the incinerators, monitoring certain process parameters and conducting emissions testing.

## 1.4 DOCUMENT ORGANIZATION

The remainder of this document is structured as follows:

- » Section 2.0 provides a general physical description of the incineration system and associated unit operations (including the air pollution control system).
- » Section 3.0 provides the test program results and discussion.
- » Section 4.0 provides a summary of the test program.
- » Section 5.0 provides a description of the sampling and analytical methods.
- » Section 6.0 provides the test program quality assurance/control procedures.
- » Section 7.0 includes the Continuous Monitoring System (CMS) Performance Evaluation that was performed as part of addressing the overall MACT testing requirements.
- » Appendix A provides copies of facility process data.
- » Appendix B provides a schematic of the test location.
- » Appendix C provides copies of all field data and calculations.
- » Appendix D provides copies of equipment calibration data.
- » Appendix E provides copies of laboratory reports
- » Appendix F provides copies of all CMS/CEMS performance evaluation documentation.

## 2. SOURCE DESCRIPTION AND OPERATING DATA

### 2.1 PROCESS OVERVIEW

This section presents a summary description of the GD-OTS MS reactive waste incineration system. The main components of the GD-OTS MS System consist of feed preparation and handling systems, feed conveying systems, two thermal destruction units, a secondary combustion chamber, air pollution control equipment, metals and ash handling systems, and plant support systems. The remaining plant support systems are: fuel gas supply, electric power (including a generator for backup emergency electrical power), instrument and plant air, plant water, fire water, runoff water control, and telecommunication systems. The control system for operating the incineration plant uses a distributed control system (DCS), which incorporates all necessary environmental monitoring. The DCS operates on an Uninterruptible Power Supply (UPS) in the event of commercial electrical power failure. A representative Process Flow Diagram (PFD) for this Incinerator is provided in **Figure 2-1**.

### 2.2 WASTE FEED SYSTEMS

Waste is brought on site by truck and taken to one of four storage magazines on the facility site. The magazines are sited and designed for 100,000 pounds Net Explosive Weight (NEW) of Class 1.1 Explosives each. The RKI is fed a wide variety of solid explosive waste materials via the Continuous Feed System. The CBF is loaded batch-wise by using steel baskets that are lifted by hoist or forklift onto the car bottom wagon. The car bottom is then moved into the furnace for combustion.

#### 2.2.1 Rotary Kiln Continuous Waste Feed System

A wide variety of explosive wastes are introduced into the RKI via the Continuous Feed System which handles assembled items, packaged loose items, containers of liquids and sludge, and prepackaged bulk waste. This type of feeding is semi-continuous in nature, in that the feed is introduced to the kiln in finite quantities (batches), but these batches are continuously fed at a specified rate. All wastes are fed into the cooler end of the kiln.

Explosive waste material is placed in one or both of the Weigh/Feed Stations for dumping onto the Feed Conveyor. Each Weigh/Feed Station is controlled by the distributed control system (DCS) into which specific feed rate parameters are loaded for each waste material. Maximum feed weights are established and any attempt to over feed the Weigh/Feed Station results in rejection of the attempted feed.

The Feed Conveyor is enclosed with expanded metal covers to prevent loading feed other than through the Weigh/Feed Stations where the waste is weighed and the rate of feed controlled. If the material in the Weigh/Feed Stations is within the allowable weight limits, it will be transferred to the feed conveyor. The feed conveyor then carries the feed materials up and through the blast wall to the charge conveyor, which, in turn, transports the feed into the elevated feed chute of the Kiln Feed Housing at the low temperature end of the kiln.

When an automatic waste feed cutoff occurs, the Feed Conveyor is stopped. The Feed Conveyor can be reversed, if necessary, to withdraw any feed remaining on the approximately 3 feet long section of the conveyor that extends into the hot environment of the Kiln Containment Room. The Charge Conveyor inside the Kiln Containment Room, which operates at a higher speed than the Feed Conveyor, continues to operate to allow feed material already in the Kiln Room to continue into the retort. This also prevents material still being fed from exposure to the heat in the Kiln that could cause initiation of exposed material.

The Weigh/Feed Stations will accept materials up to 7 inches in diameter by 17 inches long, and weighing up to 40 pounds. The Feed Conveyor is an "S" shaped conveyor, which is 24 feet long and 24" inches wide and has a conductive rubber conveyor belt with fan fold sides and 4 inch high rubber cleats every 2 feet on the belt. The Charge Conveyor is 10 feet long and 12 inches wide. All conveyors have independent motors and positive gear drives. Each conveyor is capable of supporting a load equal to 40 pounds per linear foot. The centerline of the Feed Conveyor is offset from the centerline of the kiln for safety reasons.

## 2.3 MANUFACTURER, MAKE AND MODEL OF THE INCINERATOR

### 2.3.1 Rotary Kiln and Burner

The RKI was designed and manufactured by GD-OTS MS. It is a deactivation furnace designed with internal spiral flights that advance the waste through the kiln as it rotates. The GD-OTS MS Rotary Kiln is also referred to as having retort sections. The GD-OTS MS Rotary Kiln design is based on the APE 1236 kiln that the U.S. Army developed specifically to incinerate configured munitions and bulk explosives. There are a number of these installations throughout the continental United States and other countries. The Army kiln has been extensively tested and has proven to be a safe, effective method for the deactivation of munitions and explosives.

The standard Army APE 1236 kiln consists of four 5-foot long retort sections bolted together, with a nominal diameter of 3 feet, and wall thickness of 2 ½" and 3 ¼". As the kiln rotates, spiral flights propel the feed material through the retort. The flights prevent sympathetic explosive propagation between materials on opposite sides of the flight and increase the mixing of the waste material in the kiln with the flue gas and air, which increases the combustion efficiency. The internal spiral flights are spaced 30 inches apart and vary in height. The average height of the flight is 10 inches.

The GD-OTS MS Kiln uses six retort sections in lieu of the Army kiln design of only four sections in order to increase the material residence time by 50 percent. The increased residence time provides greater destruction efficiency for the more difficult to incinerate feeds. The overall length of the kiln, including the Kiln Feed Housing and Kiln Burner/Discharge Housing, is approximately 46 feet. The cross sectional area inside the retort is 3.7 square feet which results in a total retort volume of 109.2 cubic feet, after taking into account the volume occupied by the spiral flights. The effective combustion volume, which reflects the dimension from the point where the waste ignites to where the combustion gases exit the kiln, is 36.9 cubic feet.

The wall thickness of the GD-OTS MS kiln is 3 ¼" for all six sections. This provides extra strength to the kiln to ensure maximum safety during detonations of heat sensitive materials. The material of construction for all sections is A217 grade WC-9 cast steel for high strength and ductility at elevated temperature. Refractory or firebrick is not used for insulation because fragments and explosive pressures would destroy any of these materials.

The GD-OTS MS RKI has a single burner assembly at the hot end of the kiln, which is the opposite end from where the wastes are fed. A natural gas burner is used during the destruction of waste to sustain the operation of the GD-OTS MS Rotary Kiln. The fuel consumption varies with the specific waste material to be processed. When a high heat content material is incinerated, natural gas will only be required to support the pilot, which requires approximately 75,000 BTU/hr. of fuel. At maximum firing, the fuel consumption may be increased up to 4,000,000 BTU/hr. The burner is equipped with all accessory equipment necessary for the burner operation. A flame sensor that detects the presence of flame by sensing its ultraviolet light emissions acts as a flame failure safety device. The DCS will not allow wastes to feed to the kiln unless the flame sensor in the flame safety system detects flame from the burner.

#### 2.3.1.1 Location of Rotary Kiln Combustion Zone Temperature Device

There are no temperature measuring devices that can survive the hostile environment in the combustion zone of the kiln due to the damage they would suffer from fragments, heat, and overpressures produced when explosive items detonate within the kiln. Therefore, the kiln feed end temperature used for controlling kiln operations, is measured using a type K thermocouple located in the kiln exhaust duct just as it exits the kiln feed end housing. The burner end temperature, also used for controlling kiln operations, is measured using a type K thermocouple located just above the burner in the kiln burner end housing at the materials discharge end of the kiln.

### 2.3.2 Car Bottom Furnace

The Car Bottom Furnace is a stationary natural gas fired combustion chamber that is used on an intermittent basis for treatment and decontamination of large, unusual or irregular shaped metal pieces, and for incineration of explosive contaminated trash such as, rags, soiled uniforms, manufacturing wastes, and packaging materials.

The contaminated trash/waste materials for incineration are transported to the Car Bottom Unloading Area in boxes or drums. These containers are then placed or dumped into a solid bottom steel basket. An overhead

hoist or forklift is used to lift the baskets onto the car bottom wagon. A scale is provided under the car bottom wagon, which weighs the materials prior to being moved into the incinerator. Materials are loaded onto the car bottom and the car bottom is moved into the furnace. If the allowable weight limit is exceeded, the car bottom furnace is locked out from starting. Contaminated drums and large metal items may be placed directly on the car bottom wagon.

The Car Bottom Furnace is constructed of refractory lined carbon steel. The maximum firing rate of the two forced draft natural gas burners is 3,600,000 BTU/hr. Exhaust gases from the Car Bottom Furnace are directed to the Secondary Combustor. The Car Bottom Furnace is generally operated pyrolytically (oxygen starved) in order to control the incineration process. Two water spray nozzles in the combustion chamber are activated, one at 1300°F, and the second at 1400°F, as necessary, to assist in controlling combustion temperature. An additional water spray nozzle in the exhaust duct exiting the Car Bottom Furnace is activated at 900°F to control the temperature of the exhaust gases going through the exhaust duct to the Secondary Combustor. In these water sprays, only sufficient water is added to control temperature and no liquid water effluent is generated. The Car Bottom Furnace is controlled to a maximum burn-off rate of combustible material of 300 lb/hr. Thus, if a batch of waste to be burned in the Car Bottom Furnace contains 600 pounds of combustible material, the batch cycle time would be 2 hours. The Secondary Combustor completes the burn of volatiles and partially oxidized gases contained in the Car Bottom Furnace exhaust gases. Operating parameters confirming treatment of waste by the Car Bottom Furnace are recorded and maintained via the DCS.

### **2.3.3 Operational Modes**

The Rotary Kiln or Car Bottom Furnace can be operated alone or at the same time. This Confirmatory Performance Test Plan is for the dual operation of the furnaces. The compliance with emission standards for the individual operation of either furnace has been previously been tested with the Notice of Compliance submitted July 2004.

### **2.3.4 Secondary Combustor**

The Secondary Combustor (SC) provides the second stage in the final combustion of the exhaust gases from either the kiln or the Car Bottom Furnace, depending on which primary combustion unit is operating. The SC is horizontally mounted, and is sized for 21,520 acfm (at 2200°F) of flue gases. The SC is capable of heating the exhaust gases from the kiln or car bottom furnace up to 1800 - 2200°F, provides greater than four second residence time, and achieves highly turbulent flow to ensure good mixing and therefore, effective destruction of waste gases. The combustion chamber is constructed of carbon steel and is internally insulated with 12 inches of modular ceramic fiber insulation.

The burner for the SC is a forced draft natural gas burner that normally fires at a rate of 9,000,000 BTU/hr. The burner is designed for a maximum heat release of 12,000,000 BTU/hr. As in other burners used at the GD-OTS MS Incineration System, the SC burner is equipped with a UV flame sensor to monitor ignition and assure flame is present when waste is being fed. Additional combustion air is provided as needed to the SC by the SC Combustion Air Blower depending on the exact requirement for each type of waste. Air for the SC is drawn from the Kiln Containment Building into the Secondary Combustor Air Blower.

## **2.4 AIR POLLUTION CONTROL EQUIPMENT**

### **2.4.1 Spray Dryer**

In addition to the pollution control function that the SC provides, this plant utilizes a two-stage air pollution control system (APCS). The first stage of this system is the Spray Dryer. The exhaust gases from the Secondary Combustor immediately enter the Spray Dryer where they are quenched from between 1,800-2,200°F to approximately 350-375 °F with a dilute soda ash/water solution. The temperature of the exhaust gas from the Spray Dryer is maintained by controlling the flow of quench water fed to the Spray Dryer. Concurrent with vaporization of the water, the soda ash reacts with sulfur oxides and/or hydrochloric acid, if present, to form sodium salts. These reaction products, together with the unreacted soda ash, become entrained in the gas within the Spray Dryer as solid particulate matter. The soda ash is received as a dry powder which is dissolved in water at a either a 5% or 10% concentration.(the 5% is normally used for lower feed rate requirements due to operational reliability and when high feed rates are required, the 10% concentration is used and the DSC setting

is changed). This soda ash solution feed rate is controlled by the DCS and is mixed with the quench water that is fed to the Spray Dryer. The amount of quench water fed is controlled by the Spray Dryer Exit Temperature.

The following formula is used to calculate the Soda Ash feed rate to the Spray Dryer in lbs per minute:

$$FR(SA) = \{1.495xFR(Cl) + 1.652xFR(S) + 0.663xFR(Br) + 2.790xFR(F)\} \div 0.65 \times 1.1$$

where FR(SA) is the feed rate of soda ash in lb/min,

FR(Cl) is the total feed rate of chlorine in lb/min,

FR(S) is the total feed rate of sulfur in lb/min

FR(Br) is the total feed rate of Bromine in lb/min and

FR(F) is the total feed rate of chlorine in lb/min.

The factor of 0.65 is the soda ash utilization rate. The factor of 1.1 allows an acceptable factor to assure HCL removal that meets or exceeds the statutory requirements.

$$GPM(SA) = FR(SA) / 0.1 \text{ (10\% concentration)} / 8.762 \text{ (Specific Gravity of solution) lb/gal}$$

Of the total particulate matter, which consists of sodium salts, unreacted soda ash, and metal oxides in the form of fly ash, approximately 10 percent is expected to settle in the bottom section of the Spray Dryer. The double sliding gate valve transfers the dry solids from the bottom section of the Spray Dryer to the collection container for removal to a RCRA approved hazardous waste landfill along with other ash from the incineration system. The Spray Dryer controls are designed so that waste feed is cut off to the incinerator if the flow of soda ash/quench water solution stops. Emergency water sprays are activated in this situation to assure protection of the equipment.

#### **2.4.2 Baghouse**

The second stage of the APCS is the three-section Baghouse (ME-105A, B, C). The Baghouse is designed so that each section operates in parallel. The APCS is designed to operate with just two of the Baghouse sections on-line. Unreacted acidic components and the bulk portion of the total particulate matter are carried over to the Baghouse in the exhaust gases leaving the Spray Dryer.

The particulate matter collects on the Teflon® coated fiberglass/Gortex® bags of the Baghouse to obtain a minimum overall particulate removal efficiency of 99 percent for total fly ash, total reaction products, and total soda ash. Although the primary function of the Baghouse is to remove particulates, an additional scrubbing reaction takes place there. Unreacted soda ash, which collects on the bags, reacts with unreacted sulfur oxides and hydrochloric acid in the effluent gases from the Spray Dryer.

The Baghouses have a pulse-jet cleaning system, which uses compressed air to clean the bags. The dust, composed of the reaction products, fly ash and unreacted soda ash, is collected in the bottom section of the Baghouse. Rotary Valves in the bottom of each Baghouse section transfer the collected dust to the collection containers for offsite disposal at a hazardous waste landfill.

The Baghouse is sized to accommodate approximately 11,740 acfm of flue gas. The air to cloth ratio in the Baghouse, which is defined as the actual gas flow divided by the cloth area available for filtration, is approximately 2.5:1 ft<sup>3</sup>/min-ft<sup>2</sup>. The pressure drop across the Baghouses is 5" to 12" water column (WC). The Baghouse is bypassed only in the event that the gas exiting the Spray Dryer exceeds the maximum operating temperature of the Baghouse (approximately 450°F). An interlock is provided to activate automatic waste feed cut off if the bypass valve is opened. Emissions released during bypass operations will be minimal since the waste feed is stopped and the system will be going into shutdown mode to correct the conditions that resulted in the operation of the bypass valve.

### 2.4.3 Induced Draft Fans

The exhaust gases from the Baghouse enter the Induced Draft Fans at 325°F. The fans are designed to draw the flue gases out of the kiln or car bottom furnace and through the downstream equipment. Each fan is capable of handling 100 percent of the total flow. Both fans are operated continuously, each handling part of the total flow. If a fan fails, the total flow shifts to the other operating fan. This system will prevent the release of emissions due to failure of one fan.

### 2.4.4 Stack

The exhaust gases from the Induced Draft Fans enter the Stack where they rise through the Stack and are released to the atmosphere. The Stack is a key contributor to the emission characteristics of the plant. By design the flue gas dispersion characteristics are enhanced. The Stack for this plant is 213 feet (65 meters) tall and 2 feet in diameter. The Stack is constructed of corrosion resistant carbon steel ducting inside of a self-supporting, insulated outer stack shell, which is mounted on a concrete foundation. Condensed water from the Stack, if any, drains to the APCS pad sump.

## 2.5 STACK EMISSIONS MONITORING

Stack gases are monitored on a continuous basis for carbon monoxide, and oxygen via a Continuous Emissions Monitoring System (CEMS). Responses from the CEMS are fed to the DCS, where the CO hourly rolling average is calculated and interlocked to the waste feed conveyor as part of the Automatic Waste Feed Cutoff System (AWFCO) discussed in Section 2.7 below. The following provides a brief description of the CEMS instruments including the operating range and measurement principal.

**Table 2-1 Continuous Emission Monitors**

Parameter	Mfg.	Range	Principle
Oxygen	Rosemount OXA Extractive	0-25%	Paramagnetic
Carbon Monoxide	Teledyne Model T800	0-200 & 0-3,000ppm	Infrared

## 2.6 PROCESS MONITORING AND CONTROL

The GD-OTS MS incinerator is equipped with a DCS that is capable of sensing field instrument values, performing the necessary process adjustments and automatically shutting off the waste feed conveyor or shutting the entire process down if operational parameters deviate from required operating ranges. The DCS is capable of monitoring the "operational envelope" of the incinerator and is capable of performing a number of activities including:

- » Control room indication of processor sensors located within the incinerator (such as pressure indication of a field installed pressure transmitter);
- » Process controller for single instrument loops or an individual sub-system, such as a pressure control loop involving a sensor reading from one pressure transmitter affecting the function of one pressure control valve;
- » Alarm for an exceedance of a designated set point, such as a high pressure or low temperature;
- » Shut-down of individual equipment when the measured parameter exceeds a set point (such as a shut-off of waste feed conveyor when the combustion temperature is too low); and
- » Shutdown of one or more subsystems when one or more measured parameters exceed a set point (such as shut-down of secondary combustion burner when high exit temperature in the spray dryer is detected).

The DCS will continuously control and monitor the operation of the incinerator. When out-of-range conditions exist, it will notify the operator of those conditions. The DCS is programmed to shut-down equipment (i.e., bring the system into a safe mode) when designated parameters are exceeded, which is a protective mechanism against potential equipment damage, operation outside of permit limits, or conditions that might lead to a release to the environment.

## 2.7 AUTOMATIC WASTE FEED CUT-OFF SYSTEM

The GD-OTS MS incineration System has an Automatic Waste Feed Cut-Off (AWFCO) System that will shut waste feeds off to the kiln by stopping the feed conveyor in the event certain operating parameters deviate from allowable set points. The DCS continuously monitors operating parameters, making adjustments to the process as needed for proper control. Alarm logic is incorporated into the DCS system to automatically initiate an AWFCO. **Table 2-2** summarizes current AWFCO set points (AWFCO set points was revised for the higher rates during the CFPT). When an AWFCO is initiated during the operation of the Car Bottom Furnace, The burned is shut down and any infiltration air is minimized to limit the burning. Once the AWFCO situation has been resolved and the system is at steady state the CBF burner is re-lit and the burn is continued. AWFCO limits have been established based on regulatory or permit limits that are summarized below.

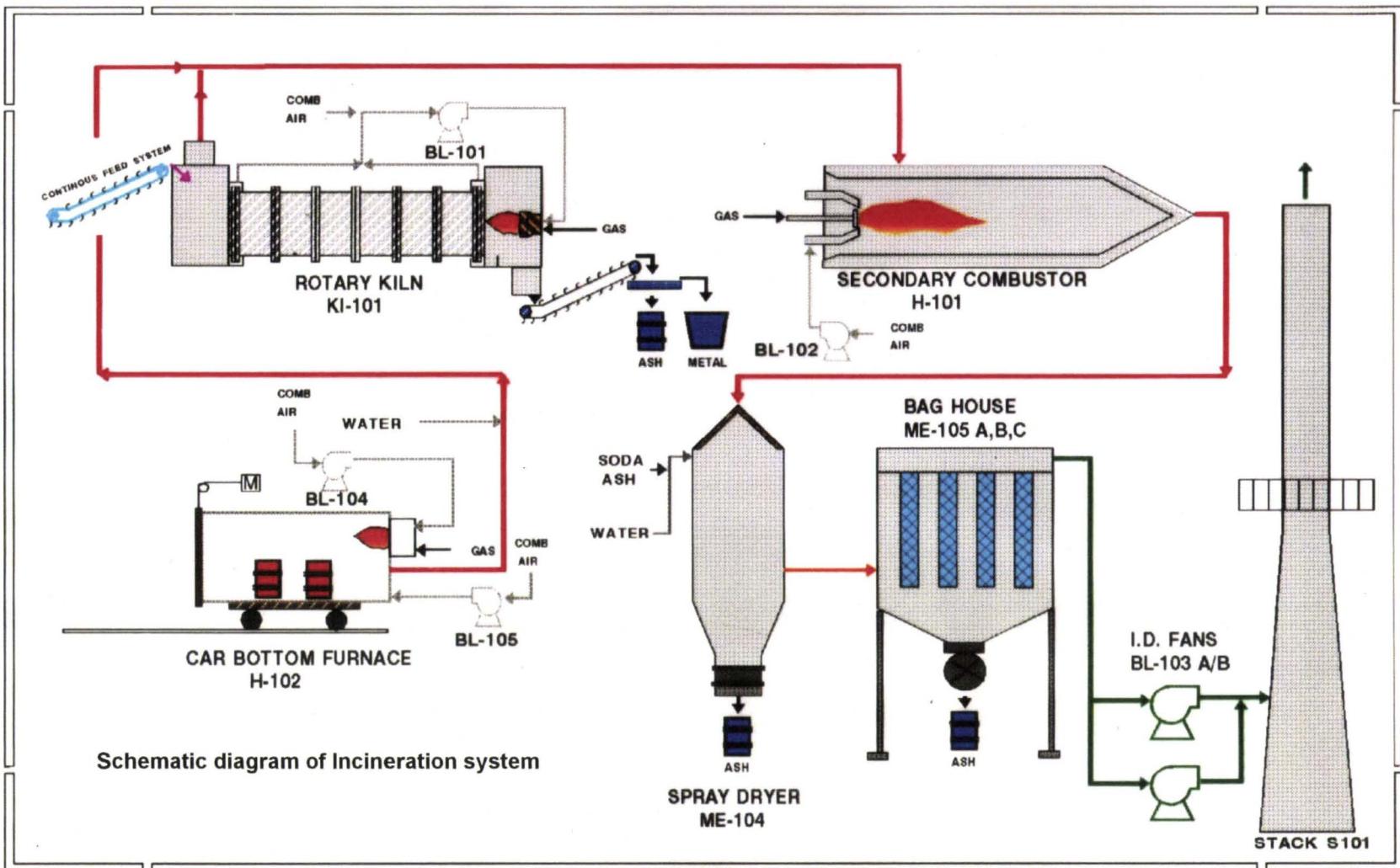
- » Regulatory/permit limits – established to comply with existing permits. An example of this type of limit is the minimum temperature AWFCO, below which waste cannot be fed until the proper minimum temperature is re-established with auxiliary fuel. In addition, the HWC MACT regulations require that the AWFCO system be interlocked with the span of each process instrument that is part of the Continuous Monitoring System (CMS). A listing of these CMS instruments and their interlocked span set points is maintained as part of GD-OTS MS's Operating Record.
- » In addition to the AWFCO system, operators can manually shutdown waste feeds or the entire process should this be needed. The DCS has also been programmed to stop the waste feed based on other factors summarized below.
- » Process safety limits – established to assure process equipment is protected and unsafe operating conditions do not occur. An example of this is inadequate excess air in the combustion chamber that can lead to fuel rich conditions and the possibility of an explosion.
- » Utility or Power failure – established to facilitate a controlled shutdown of the process during loss of process air, steam, water or electricity. An example of this is the loss of instrument air that is necessary for certain types process instruments to function properly. Wastes will not be re-introduced into the incinerators until proper operation of key instruments is re-established.

**Table 2-2 Automatic Waste Feed Cutoff (AWFCO) Summary**

<b>Operating Parameter</b>	<b>MACT Setpoint</b>	<b>Monitoring Device Location</b>	<b>Basis for AWFCO</b>
Max Haz Waste Feed	3,055 lbs/hr HRA	ME-108 A/B Feed Room	Average of Average Feed rate from CPT
Rotary Kiln Pressure	-0.0" wc Instantaneous	PA – 105 Kiln Feed Housing	Title V Permit
Low Secondary Combustor Temp	1819°F HRA	TT – 268 Secondary Combustor	Average of the Minimum HRA from the CPT
Minimum Soda Ash Solution Rate	0.3 gpm or calculation rate	FT – 313 Soda Ash Pump	Minimum flow or Calculation from feed rate spreadsheet
High Spray Dryer Exit Temp	375°F HRA	TT – 308 Spray Dryer Exit	Average of the Maximum HRA from the CPT
Baghouse Differential Pressure	<5.8 " wc HRA >12.0 " wc HRA	DP – 359 Duct Before & After Baghouse	Historical Experience and Previous RCRA Permit
Baghouse Bypass Damper	Open	ZS – 358 Bypass Damper	Title V Permit
Broken Bag Detector	100	XS-355, 362, 372 Outlet of each chamber	Title V Permit
High Gas Flow Rate	641,334 scfh (HRA)	FT – 412 Stack	Average of the Maximum HRA from the CPT
CO	100 ppmv (HRA)	AT – 407 Stack	Title V Permit
O2	3% (HRA)	AT – 409 Stack	Title V Permit
Total Chlorine Feed	110.1 lb/hr 12HRA	CMS	Average of the Avg HRA from the CPT
Total Ash Feed	663.4 lb/hr 12HRA	CMS	Average of the Avg HRA from the CPT as calculated from feed rate spreadsheet
Total Lead Feed	92.0 lb/hr 12HRA	CMS	Based on the extrapolation formula in the CPT Plan and SRE from CPT
Total Cadmium Feed	9.2 lb/hr 12HRA	CMS	Based on the extrapolation formula in the CPT Plan and SRE from CPT
Total Chromium Feed	44.8 lb/hr 12HRA	CMS	Based on the extrapolation formula in the CPT Plan and SRE from CPT
Total Beryllium Feed	20.16 lb/hr 12HRA	CMS	Based on the extrapolation formula in the CPT Plan and SRE from CPT
Total Mercury Feed	0.676 gr/hr 12HRA	CMS	MTEC Calculation at avg stack gas flow
SVM Emissions	0.1725 mg/dscm 12HRA	CMS	Based on the extrapolation formula in the CPT Plan and SRE from CPT
LVM Emissions	0.069 mg/dscm 12HRA	CMS	Based on the extrapolation formula in the CPT Plan and SRE from CPT
Mercury Emissions	0.130 mg/dscm 12HRA	CMS	MTEC Calculation

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Figure 2-1 Process Flow Diagram



### 3. RESULTS AND DISCUSSION

This section summarizes the test program results. Appendix C presents copies of the field data and calculations. Copies of analytical reports are presented in Appendix D.

#### 3.1 DIOXINS AND FURANS EMISSIONS

A summary of the dioxins and furans emissions is provided in **Table 3-1** below. Please note that Test Run No. 1 was voided due to a failed post-test leak check. The dioxins and furans emissions for the GD-OTS MS incinerator (emissions for Test Runs 2, 3, and 4 averaged 0.107 ng/dscm @ 7 % O<sub>2</sub>) were well within the HWC MACT emission standard of 0.40 ng/dscm @ 7% O<sub>2</sub>.

**Table 3-1 Summary of Dioxins and Furans Emissions**

Run Identification	Run 2	Run 3	Run 4	Average	Percent of Standard <sup>a</sup>
Run Date	20Nov13	20Nov13	21Nov13		
Start/Stop Time	1449-1754	1818-2122	0918-1224		
Run Duration (min.)	180	180	180		
<b>Exhaust Gas Conditions</b>					
Temperature (deg. F)	222	223	215	<b>220</b>	
Moisture (volume %)	23.9	24.0	24.0	<b>24.0</b>	
Oxygen (dry volume %)	15.50	15.60	15.60	<b>15.57</b>	
Carbon Dioxide (dry volume %)	3.8	3.6	3.5	<b>3.6</b>	
<b>Sample and Exhaust Gas Flow Rate Data</b>					
Sample Volume (dscf)	96.3	95.8	96.4	<b>96.2</b>	
Volumetric Flow Rate (acfm)	11,288	11,222	11,112	<b>11,208</b>	
Volumetric Flow Rate (dscfm)	6,412	6,356	6,403	<b>6,390</b>	
<b>Dioxin/Furan Results</b>					
PCDD/DF TEQ (ng/dscm @ 7% O <sub>2</sub> )	0.096	0.099	0.126	<b>0.107</b>	<b>26.7</b>

<sup>a</sup> PCDD/DF emission limit is 0.4 ng/dscm @ 7% O<sub>2</sub>

## 4. TEST PROGRAM

### 4.1 SUMMARY OF THE TEST PROGRAM

Triplicate test runs were performed to demonstrate compliance with the dioxin/furan emission standard while the incinerator operated under normal operating conditions. These operating conditions were within the range of the average level to the maximum or minimum level that is allowed for the following operating parameters. Process operating data collected by facility personnel is presented in **Appendix A**.

As required by 40 CFR 63.1208(b)(1)(ii), the RM 23 sampling train was operated for a minimum of 180 minutes (3 hours) to sample a minimum of 2.5 dry standard cubic meters of stack gas during each sampling run.

#### 4.1.1 Summary of Operating Conditions

**Carbon Monoxide CEMS:** Carbon monoxide (CO) CEMS emissions were targeted at levels between the average value to the maximum value allowed, although levels lower than average could be seen due to the wastes being fed to the CBF generating minimal CO. During the last CPT the average CO value was 2 ppm. The average value was determined over the previous 12 months as defined in 40 CFR § 63.1207 f(i). The maximum value allowed is the emission standard cited in 40 CFR § 63.1219(a)(5)(i). CO average, maximum, and actual test run average values are displayed in **Table 4-1**.

**Maximum and average spray dryer temperature:** The gas temperature at the inlet to the dry particulate matter control device or baghouse is measured at the exit of the spray dryer, a K type thermocouple protruded through the duct into the gas stream. The temperature was targeted in a range between the average value to the maximum value allowed. The average value of the spray dryer exit temperature was determined by following the procedures stated in 40 CFR §63.1207 (g)(2)(ii). The maximum temperature was established during the CPT performed in June 2011. **Table 4-1** displays the minimum, average, and actual test run average spray dryer exit temperatures for this CFPT.

**Minimum and average combustion chamber temperature:** Combustion temperature in the secondary combustor is measured in the middle of the chamber, a R type thermocouple protruded through the refractory wall into the main chamber. The combustion temperature was targeted in a range between the average value to the minimum value allowed. The average value of the combustion chamber temperature was determined by following the procedures stated in 40 CFR §63.1207 (g)(2)(ii). The minimum combustion chamber temperature was established during the CPT performed in June 2011. **Table 4-1** displays the minimum, average, and actual test run average chamber temperatures for this CFPT.

**Average and maximum flue gas flowrate:** Flue gas flow rate is used as an indicator for residence time in the combustion chamber. The flue gas flow rate was targeted in a range between the average value to the maximum value allowed. The average value of the flue gas flow rate was determined by following the procedures stated in 40 CFR §63.1207 (g)(2)(ii). The maximum flue gas flow rate was established by the CPT performed in June 2011. The average, maximum, and actual test run average flue gas flow rates for this CFPT are displayed in **Table 4-1**.

**Average and maximum hazardous waste feed rate:** The hazardous waste feed rate to the RKI and CBF was targeted in a range between the average values to the maximum values allowed. The average hazardous waste feed rate for the RKI and for the CBF was determined following the procedures stated in 40 CFR §63.1207 (g)(2)(ii). Maximum hazardous waste feed rates were established by the CPT performed in June 2011. **Table 4-1** displays the average, maximum, and actual test run average hazardous waste feed rates.

**Chlorine feed rate:** The actual chlorine levels fed to the incinerator was dependent on the waste feeds available at the time of testing as the chlorine content of the incinerator's normal waste feeds are highly variable depending on the products being made at the time. **Table 4-1** displays the average, maximum, and actual test run average chlorine feed rates.

#### 4.1.2 Description of CFPT Feeds

A summary of the feed rates observed during the test program is presented in **Appendix A**.

#### 4.1.2.1 Car Bottom Furnace Feeds

To demonstrate compliance with the dioxin/furan emission standard, GD-OTS MS fed combustible materials, such as paper and wood, that simulates plant trash from explosive manufacturing operations at a target quantity of 250 lbs/hr to the Car Bottom Furnace.

#### 4.1.2.2 Kiln Maximum Throughput Condition Feeds

To demonstrate compliance with the dioxin/furan emission standard, GD-OTS MS fed the following material at the listed target rates:

- CBU Bomblet Halves – 1.650 lbs/hr
- Chlorine in the form of AP Propellant, - 5 lbs/hr Chlorine = 24 lbs / hr Propellant

**Table 4-1 Summary of Operating Conditions**

Parameter/Units	Min Value*	Average Value	Max Value*	Actual Test Run Averages		
				Run 2	Run 3	Run 4
Total RKI Hazardous Waste Feed Rate (lb/hr)	-	1,578	3,055	1,653	1,660	1,640
Total Chlorine Feed Rate (lb/hr)	-	3	110	6.7	6.7	6.7
Total CBF Hazardous Waste Feed Rate (lb/hr)	-	224	300	247.2	246.5	247.4
Secondary Combustor Outlet Temperature (deg F)	1,819	1,889	-	1,870	1,870	1,870
Spray Dryer Outlet Temperature (deg F)	375	353	-	360	360	360
Stack Flow (scfh)	-	627,263	641,334	637,994	637,929	637,994
CO (ppm)		6.6	100	0.3	0.2	0.1

\*Minimum and Maximum values were established from the comprehensive performance test performed in June 2011.

## 5. SAMPLING AND ANALYTICAL PROCEDURES

This section describes the sampling and analytical procedures that were utilized as part of the testing program.

### 5.1 SAMPLING PROCEDURES

The sampling activities described below were conducted during all test runs. All field activities were documented in accordance with EPA accepted procedures and copies of all field data sheets are included in **Appendix C**.

Gases discharged from the exhaust stack were sampled by O'Brien & Gere for the following parameters:

- » Flue gas velocity, flow rate, temperature, moisture content and fixed gas ( $O_2$  and  $CO_2$ ) composition;
- » Dioxins and Furans (PCDDs/PCDFs)

#### 5.1.1 Dioxins and Furans (PCDDs/PCDFs)

An EPA RM 23 sampling train was used to sample for emissions of polychlorinated dibenzo dioxin and furans (PCDD/PCDFs). The stack gas was sampled by isokinetically passing the gas through a pre-extracted filter, into a cooling condenser and through the XAD-2 resin trap. After exiting the XAD-2 resin trap the exhaust gas was bubbled through a four impinger train with the first two impingers containing 100 milliliters (mls) of deionized water, the third was empty and the fourth contained a known amount of indicating type silica gel.

#### 5.1.2 Gas Stream Velocity, Moisture and Fixed Gases

Gas stream flowrate, moisture and fixed gas concentration were determined concurrent with the Method 23 sampling train. Gas stream velocity was determined using a pitot tube and water manometer in accordance with EPA Method 2. Gas stream temperature was determined at each of the Method 2 traverse points using a Type "K" thermocouple and pyrometer. Gas stream moisture was determined as specified in EPA Method 4 concurrent with the isokinetic sampling train. In this procedure the impinger contents are measured or weighed before and after each test run and used in conjunction with the metered gas volume to determine the gas stream moisture content.  $CO_2$  concentration for gas stream molecular weight determination was determined in accordance with EPA Method 3 (Fyrite procedure) during each test run.  $O_2$  concentration for constituent oxygen correction and gas stream molecular weight determination was measured by the facility CEMS.

#### 5.1.3 Test Port and Traverse Point Locations

Sample ports in the circular 30-inch inside diameter (ID) stack are located approximately 20-feet (8.0 diameters) downstream of the breaching and approximately 175-feet (70.0 diameters) upstream of the stacks exit to atmosphere. A schematic of the test port locations is presented in **Appendix B**.

## 5.2 ANALYTICAL PROCEDURES

This section describes the analytical protocols that were used to analyze samples during this CFPT. Samples of stack gas were collected and analyzed for the parameters previously discussed using the appropriate laboratory protocols detailed in this section.

#### 5.2.1 Analysis for PCDDs/PCDFs

Stack flue gas samples collected using the Method 23 sampling train was analyzed for polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (PCDDs/PCDFs). Each Method 23 train was prepared and split appropriately for analyses for PCDDs/PCDFs: combined front-half and back-half analyses was performed in accordance with Method 23.

Briefly, the XAD and filter was spiked with internal standards and then sequentially extracted with toluene. Method 23 analyses (which include high resolution GC/MS as per EPA Method 8290) incorporate five isotopically labeled PCDD and PCDF field surrogates and nine labeled PCDD/PCDF internal standards. The field surrogates are spiked into the XAD resin prior to field sampling; their recoveries are monitored to assess overall method accuracy and precision. The internal standards are added at a level of 2,000 pg/sample prior to Soxhlet extraction. These internal standards are used for direct quantification of all surrogate and native PCDD/PCDF

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species. The addition of these standards prior to the extraction and cleanup procedures permits internal correction for any losses of target analytes that might occur during the preparation steps.

Method 8290 details instrument tune, GC column performance and instrument calibration requirements for the analysis of stack gas samples by high resolution gas chromatography/high resolution mass spectrometry. Instrument calibration was performed for all 17 2,3,7,8- substituted PCDD and PCDF isomers; data was reported for each of these target analytes and for the total dioxins and total furans at each level of chlorination from Cl<sub>4</sub> through Cl<sub>8</sub>.

## 6. QUALITY ASSURANCE/QUALITY CONTROL

This section presents the results of all QA/QC measures implemented during the field sampling program and all phases of subsequent analysis. Data generated for the program are judged to be valid as overall accuracy and precision results are consistent with general objectives. Analytical QA/QC data are presented to support all sample results used for determining compliance with performance criteria or emission standards.

### 6.1 SAMPLE COLLECTION QA/QC

One (1) field reagent blank of the M23 sampling train was submitted for analysis for this test program. Sampling QA/QC measures for this program included the calibration of all applicable sampling equipment used as described below. Field equipment were calibrated according to EPA procedures specified in EPA/600/R-94/038e (September 1994) and 40 CFR 60, Methods 1-5, as well as manufacturer's specifications.

- » **Dry Gas Meters and Orifice Meters (EPA Method 5 Type)** - Dry gas meters for all sampling trains were calibrated using critical orifices. The procedure entails five runs using five separate critical orifices running at an actual vacuum 1-2 in. greater than the theoretical critical vacuum. The minimum sample volume required per orifice is 5 ft<sup>3</sup>. Meter boxes are calibrated annually and after each test program. All annual and post-test calibration forms for the meter box is provided in **Appendix D**.
- » **Sampling Nozzles** - Each glass nozzle was calibrated with a micrometer prior to testing and identified with a unique ID number. These data were then checked onsite prior to use. The internal diameter of each nozzle used is measured to 0.001 inches along three points of the circumference with a dial vernier caliper and the three measurements are then averaged. Nozzle calibration data are provided in **Appendix D**.
- » **Balance** - The analytical balance used in the field to determine initial and final silica gel weights is calibrated against Class M weights provided by the Mettler Corporation.
- » **Thermocouples** - The Type K thermocouples in each meter control box, heated sample box, impinger umbilical connector, XAD resin trap and sample probe are calibrated against ASTM mercury-in-glass thermometers at two or more points: an ice bath, ambient temperature and/or boiling water bath. Calibration data are provided in **Appendix D**.
- » **Pitot Tubes** - Each S-type stainless steel pitot tube used is designed to meet geometric configurations as defined in EPA Method 2. Sample probe calibration data forms are provided in **Appendix D**.

### 6.2 SAMPLE TRAIN LEAK CHECKS

Pitot tube leak checks were conducted in accordance with EPA RM 2. Leak checks were conducted on the EPA Method 23 sampling train prior to and following each test run in accordance with the test method. Please note that the post test leak check for Test Run No. 1 failed to meet the applicable requirements and therefore was voided and a fourth test run was conducted.

### 6.3 SAMPLE ANALYSIS QA/QC

This section provides a detailed presentation of QA/QC results from sample analysis as reported by the analytical laboratory. Key QC data related to matrix spikes, surrogate spikes, duplicate analyses, laboratory control samples (blank spikes), method blanks and/or field blank results are presented in tabular format. Other routine QC procedures followed such as calibration checks and additional method-specific protocols are described in the case narratives and analytical data packages provided in **Appendix E**. Also, unless noted otherwise, all holding times and method-specific QC criteria were met and reported results met all applicable NELAC requirements.

#### 6.3.1 PCDDs/PCDFs

Evaluation of the validity of the PCDD/PCDF data resultant from the analysis of the Method 23 sampling train samples was based on the following criteria:

- » Recoveries of internal, pre-spike recovery standards added to the samples prior to sampling or sample extraction.

- › Results of duplicate analyses.
- › Results of analyses of reagent and method blank samples.

On the basis of the QC results summarized in **Table 6-1**, no sample analyses were rejected, and all data were determined to be valid.

**Table 6-1 QA/QC Summary for EPA Method 23 Samples**

QC Parameter	Target Criteria	Program Results
Reagent Blank	Below detection limit	Below reportable detection limit for all 17 congeners
Method Blank	Below detection limit	Below reportable detection limit
Surrogate Recoveries	40 – 130% recovery	All congeners within limits
Duplicate Analyses	0-20% RPD	All samples within limits
Spiked Blank Recoveries	Various limits	All congeners within limits

## 7. CONTINUOUS MONITORING SYSTEM PERFORMANCE EVALUATION TEST

### 7.1 INTRODUCTION

As part of complying with the requirements of the HWC MACT regulations, facilities must perform an evaluation of their "Continuous Monitoring System" (CMS) as part of the MACT Confirmatory Performance Test (CFPT). EPA defines the CMS in 40 CFR 63.2:

"Continuous Monitoring System (CMS) is a comprehensive term that may include, but is not limited to, continuous emission monitoring systems, continuous opacity monitoring systems, continuous parameter monitoring systems, or other manual or automatic monitoring that is used for demonstrating compliance with an applicable regulation on a continuous basis as defined by the regulation."

Based on the above definition, the main components of the CMS for the GD-OTS MS incinerator includes the following:

- » Process instruments that monitor or control key process parameters, including the Unit's Continuous Emissions Monitoring system;
- » The DCS and Data Acquisition System (or DAS);
- » The AWFCO system; and
- » The programmable logic that utilizes regulatory set-points to assure compliance.

Section 5.0 of the CFPT test plan submitted in August 2013 described a combination of activities to accomplish its objective, which is to verify that the incinerator is properly controlled and that the equipment and systems that are used are operating properly and are accurate. Prior to commencing the CFPT, GD-OTS MS personnel performed a complete evaluation of the CMS in accordance with the CFPT Plan. This evaluation included instrument audits or calibrations and auditing the function of the AWFCO system and the programmable logic used in the DCS. This report describes activities that took place and the results of the performance evaluation.

### 7.2 QUALITY ASSURANCE

The quality assurance (QA) requirements for this Performance Evaluation are summarized in **Table 7-1**. The QA requirements for CMS equipment components are established by other criteria outside this Performance Evaluation.

**Table 7-1 QA Requirements for the CMS Performance Evaluation**

CMS Component	Basis for QA Requirement	QA Specification
Field Instruments	Manufacturer recommendations	Audit/calibration meets recommended specifications for all affected instruments
AWFCO System Evaluation	MACT requirement	No failures of the AWFCO system

### 7.3 CONTINUOUS MONITORING SYSTEM DESCRIPTION

This section provides an overview of the key components of the CMS and the results of the performance evaluation. This CMS evaluation includes field instrumentation; the DCS/DAS, the programmable logic and field control (e.g., control and block valves).

#### 7.3.1 Field Instrumentation

Table 2-2 in Section 2.0 of GD-OTS MS's CFPT Plan provides information pertaining to field instruments that are part of the overall CMS. These instruments monitor and control certain process operations to assure the unit is operating safely and in compliance with applicable environmental requirements. The instruments used for these aspects of process control meet the definition of "Continuous Monitor" in 40 CFR 63.1201.

As part of initial instrument specification prior to installation and use in the process, instrument audit and calibration procedures are identified or developed. These procedures specify the frequency of auditing the instrument's function and accuracy and the actual procedure for verification. These procedures specify both the specific steps and the acceptable accuracy requirements that the instrument must meet to "pass". Troubleshooting procedures are typically included to help plant personnel correct any problems and get the instruments operational.

### **7.3.2 Continuous Emissions Monitoring System**

In addition to other field instrumentation, the operation of the incinerator also relies on its Continuous Emission Monitoring System (CEMS) to monitor stack emissions concentrations. This system is described in Section 2.5 of the CFPT Plan. When emission levels deviate from allowable limits, the DCS takes appropriate action up to and including initiating an AWFCO.

### **7.3.3 Process Control**

The process control systems for this incinerator are described in Section 2.7 of the CFPT Plan. It detects signals from process instruments, performs calculations according to the programmable logic, adjusts control equipment and notifies operators when key process parameters deviate outside acceptable limits. In addition to notifying operating personnel the AWFCO system described in Section 2.8 of the CFPT Plan will automatically shut down the waste feeds and the overall process itself in the event of deviations outside acceptable operating limits.

### **7.3.4 CMS Operation**

All the components of the CMS must be operational for the incinerator to burn waste. The DCS and overall process control system are designed in such a manner as to continually verify that operation while the unit is running. Field instrumentation (both sensing and control) are connected to the DCS in "control loops" with common wiring, electrical signal transmitters, input/output devices and related programmable logic. All components of each control loop related to the feeding of a certain type of waste (i.e., liquid organic, liquid aqueous or process vents) must be operating for the incinerator to be enabled to burn that waste. The programmable logic is designed in such a way that it can sense and verify that various components of the process and the process itself are operating as required. For example, if power is lost to a flow meter on a waste feed line, the programmable logic will sense this signal loss and initiate either an alarm or shutdown. Similarly, if the actual field position of a specific control valve disagrees beyond a certain amount with what the programmable logic calculates it should be, again, appropriate alarms and/or shutdowns are initiated.

## **7.4 CMS PERFORMANCE EVALUATION TEST**

As described above, the CMS performance evaluation test relied on a combination of activities to determine whether the CMS is operating properly. This includes the following:

- » Auditing the instrument maintenance and calibration program;
- » Calibrating field instruments;
- » Auditing the AWFCO Testing Program; and
- » Auditing portions of the programmable logic to verify that the AWFCO set-points used assure regulatory limits will be met.

Personnel who are knowledgeable of GD-OTS MS incinerator operations, their process control systems and relevant regulatory requirements, perform these activities.

### **7.4.1 Instrument Audit and Calibration**

Calibration of Field Instrumentation was conducted prior to commencing the MACT CFPT. Instrument information and calibration dates can be found in **Table 7-2** which follows this section.

Because certain instruments could not be audited or calibrated without taking the incinerator offline, these were scheduled over a period of time prior to the test program to minimize process interruptions and shutdowns.

#### **7.4.2 AWFCO System Performance Evaluation**

Another component of the CMS Performance Evaluation was auditing the AWFCO system and related DCS logic. This was accomplished by reviewing the last year of AWFCO testing logs to assess whether there were any recurring problems with the AWFCO system. Any incidences of problems with the AWFCO system were identified for follow-up and correction prior to testing.

This evaluation also included examining the appropriate programmable logic statements to compare the AWFCO set-points with the applicable operating parameter limits to assure that these are appropriate.

The AWFCO system is tested to ensure operability on a weekly basis. Prior to performing the CFPT, the AWFCO system was tested and successfully demonstrated proper operation.

#### **7.4.3 Auditing the CEMS**

The CEMS used at the GD-OTS MS incinerator are installed, operated and maintained to comply with the provisions of the applicable performance specifications and/or EPA Reference Methods. In general, this means the CEMS are calibrated daily (zero/span), quarterly (gas audits) and annually (Relative Accuracy Test Audits). Thus, the evaluation of the performance of this system was performed as part of meeting those requirements and a separate evaluation was not conducted under this evaluation.

These results show that the CEMS met the requirements of the applicable performance specifications and/or EPA Reference Methods.

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**Table 7-2 Field Instrumentation and Calibration Dates**

Equipment #	Equipment Description	Task Description	Next Date Due	Last Date Performed
PDI-102	PRESSURE TRANSMITTER	WEEKLY KILN CALIBRATION.	11/18/2013	11/14/2013
PDI-113	PRESSURE TRANSMITTER	WEEKLY KILN CALIBRATION.	11/18/2013	11/14/2013
PDI-120	PRESSURE TRANSMITTER	WEEKLY KILN CALIBRATION.	11/18/2013	11/14/2013
PI-307	PRESSURE TRANSMITTER	WEEKLY KILN CALIBRATION.	11/18/2013	11/14/2013
TT-104 A	TEMP.TRANS. FOR KILN EXIT GAS	ANNUAL CALIBRATION OF TT-104 A & B	2/5/2014	3/5/2013
TT-104 B	TEMP.TRANS. FOR KILN EXIT GAS	ANNUAL CALIBRATION OF TT-104 A & B	2/5/2014	3/7/2013
TT-268A	TEMP.TRANSMITTER	ANNUAL CALIBRATION TT-268A TT-268B TT-268C	2/5/2014	3/5/2013
TT-268B	TEMP.TRANSMITTER	ANNUAL CALIBRATION TT-268A TT-268B TT-268C	2/5/2014	3/5/2013
TT-268C	TEMP.TRANSMITTER	ANNUAL CALIBRATION TT-268A TT-268B TT-268C	2/5/2014	3/5/2013
TT-308A	TEMP. TRANS. TT-308A	ANNUAL CALIBRATION OF TT-308 A B C	2/5/2014	3/5/2013
TT-308B	TEMP. TRANS. TT-308B	ANNUAL CALIBRATION OF TT-308 A B C	2/5/2014	3/7/2013
TT-308C	TEMP. TRANS. TT-308C	ANNUAL CALIBRATION OF TT-308 A B C	2/5/2014	3/7/2013
TT-204	C.B.F. EXIT GAS TEMPERATURE TRANSMITTER	ANNUAL CALIBRATION OF TT-204	2/5/2014	3/5/2013
XSH-355	DUST ALARM BROKEN BAG DETECTOR	DUST ALARM BROKEN BAG DETECTOR CALIBRATION	2/19/2014	3/19/2013
XSH-362	DUST ALARM BROKEN BAG DETECTOR	DUST ALARM BROKEN BAG DETECTOR CALIBRATION	2/19/2014	3/19/2013
XSH-372	DUST ALARM BROKEN BAG DETECTOR	DUST ALARM BROKEN BAG DETECTOR CALIBRATION	2/19/2014	3/19/2013
FT-313	MAGNETIC FLOW TRANSMITTER & FLOW TUBE	ANNUAL CALIBRATION OF FIT-313 AND FIT-315	3/3/2014	4/1/2013
FT-315	WATER FLOW TRANSMITTER & FLOW TUBE	ANNUAL CALIBRATION OF FIT-313 AND FIT-315	3/3/2014	4/1/2013
BLDG-06F	ANALYZER HOUSE	ANALYZER HOUSE CALIBRATION	6/9/2014	10/8/2013
ME-108A	FEED WEIGH SCALES (WI-22)	ANNUAL CALIBRATION OF SCALES	7/21/2014	8/20/2013

## CONFIRMATORY PERFORMANCE TESTING OF A ROTARY KILN INCINERATOR EXHAUST

Equipment #	Equipment Description	Task Description	Next Date Due	Last Date Performed
ME-108B	FEED WEIGH SCALE (WI-4)	ANNUAL CALIBRATION OF SCALES	7/21/2014	8/20/2013
opacity	opacity lens out for cal	Opacity lens calibration	8/18/2014	9/17/2013
FT-412	FLOW TRANSMITTER(ROSEMOUNT)	ANNUAL CALIBRATION OF FIT-412 C.E.M.'S BLDG.	10/15/2014	11/15/2013
PDT-359	PRESSURE DIFF. TRANS.	ANNUAL CALIBRATION OF PDT-359	10/15/2014	11/15/2013
PT-105	PRESSURE TRANS.(FOXBORO)	ANNUAL CALIBRATION OF PT-105	10/15/2014	11/15/2013
PT-302	PRESSURE TRANS. (FOXBORO)	ANNUAL CALIBRATION CHECK PT-302	10/15/2014	11/15/2013

*Plant Operating Data*

## Summary of Operating Data for the CPT Runs

	AIT-407	AIT-409	AIT-411	FT-313	FT-412	FT-412	PDI-359	PI-105	ST-112	TI-104	TI-204	TI-268	TI-308	Kiln Feed	Chlorine	Weight/Hr
	Stack Opacity		Soda Ash	Stack Flow	Stack Flow	Bag house	Kiln Pres	Speed	Kiln	Kiln	SCC			Rate lbs/hr	Feed Rate	for CBF Batch
	CO CEMS	O2 CEMS	CEMS	Flow gpm	SCFH OMA	SCFH HRA	DP in H2O	in H2O	RPM	Flue Temp	CBF Exit Gas Temp	Outlet Temp	SD Exit Temp	HRT	to Kiln	
Run 1	Target	3.0				634,000				1,845	364	1,650	5	250		
	Average	(0.3)	15.5	2.0	0.7	638,676	637,994	7.7 (14.5)	3.1	758	845	1,870	360	1,653	6.7	247.2
	Minimum	(0.4)	14.2	1.9	0.7	621,661	637,529	7.1 (14.5)	3.1	663	391	1,861	356	1,622		
Run 2	Maximum	(0.1)	16.4	2.4	0.8	653,023	638,407	8.3 (14.4)	3.1	846	1,126	1,883	364	1,679		
	Average	(0.2)	15.6	1.7	0.7	638,435	637,929	7.7 (14.5)	3.1	808	789	1,870	360	1,660	6.7	246.5
	Minimum	(0.4)	14.3	1.5	0.6	625,515	637,209	7.0 (14.5)	3.0	721	376	1,863	356	1,630		
Run 3	Maximum	6.3	16.3	1.9	0.8	655,771	638,728	8.4 (14.4)	3.2	886	1,112	1,884	363	1,684		
	Average	(0.1)	15.6	0.2	0.8	638,073	637,994	7.7 (14.5)	3.1	708	773	1,870	360	1,640	6.7	247.4
	Minimum	(0.3)	14.2	0.0	0.7	619,324	637,262	7.1 (14.7)	2.7	505	362	1,858	353	1,423		
	Maximum	3.8	16.4	0.4	0.8	651,204	638,601	8.3 (14.5)	3.3	823	1,095	1,885	366	1,704		
	Average of Averages	(0.2)	15.5	1.3	0.7	638,395	637,972	7.7 (14.5)	3.1	758	802	1,870	360	1,651	6.7	247.1

DateTime	STACK CARBON MONOXIDE DETECTOR	O2 ANALYZER	Stack Flow (1)						Pressure Drop	Kiln Speed Across Bag	KILN FLUE GAS	SCC	SPRAY	KILN FLUE GAS	FEED	Chlorine Feed Rate	CBF Batch	Weight/Hr	
			Stack Opacity	Spray Dryer Detector	Soda Ash Flow Cntrl	Min Avg	STACK HR AV	Kiln Pressure House		Controller Assembly									
Target	AIT_407_A\	AIT_409_B	AIT_411_V	FT_313.Valu	FT_412.VI	STACK_GA	PDI_359.VI	PI_105.Val	ST_112.Va	TL_104HSI	TL_204.VI	TL_268MEI	TL_308MEI	KILN_FEEI	MAX_WT_B.Value	CBF_BATCH_TIME_SEC	Value	5	250
Average	(0.3)	15.5	2.0	0.7	638,676	637,994	7.7	(14.5)	3.1	758	845	1,870	360	1,653	Lbs Cl/hr	6.7			
Minimum	(0.4)	14.2	1.9	0.7	621,661	637,529	7.1	(14.5)	3.1	663	391	1,861	356	1,622	Minutes Fed	185	Batch		
Maximum	(0.1)	16.4	2.4	0.8	653,023	638,407	8.3	(14.4)	3.1	846	1,126	1,883	364	1,679	Cl%	21.14%	Lbs/hr	247.2	
															Lbs fed	98.2			
11/20/13 14:49	(0.3)	15.3	2.0	0.75	636,308	638,299	7.4	(14.4)	3.1	744	1,066	1,868	361	1,679	26	3,327			
11/20/13 14:50	(0.3)	15.3	2.1	0.76	632,597	638,265	7.5	(14.5)	3.1	811	1,072	1,867	360	1,658	27	3,387			
11/20/13 14:51	(0.3)	15.2	2.0	0.77	644,246	638,221	7.5	(14.4)	3.1	741	1,060	1,868	359	1,659	27	3,446			
11/20/13 14:52	(0.2)	15.5	2.0	0.77	642,141	638,189	7.7	(14.5)	3.1	773	1,040	1,866	358	1,663	28	3,506			
11/20/13 14:53	(0.1)	15.8	2.0	0.76	633,471	638,123	7.7	(14.5)	3.1	779	1,021	1,867	359	1,667	28	3,565			
11/20/13 14:54	(0.1)	15.7	2.0	0.75	631,223	638,169	7.7	(14.5)	3.1	732	999	1,867	360	1,669	29	3,625			
11/20/13 14:55	(0.3)	15.7	2.0	0.75	634,363	638,187	7.7	(14.5)	3.1	738	978	1,871	360	1,670	29	3,683			
11/20/13 14:56	(0.2)	16.1	2.0	0.75	639,340	638,164	7.6	(14.5)	3.1	780	959	1,871	360	1,671	30	3,743			
11/20/13 14:57	(0.2)	15.7	2.0	0.74	638,020	638,024	7.4	(14.5)	3.1	744	943	1,869	360	1,673	30	3,803			
11/20/13 14:58	(0.3)	15.8	2.1	0.74	643,354	637,950	7.9	(14.5)	3.1	730	932	1,870	360	1,673	31	3,864			
11/20/13 14:59	(0.3)	15.9	2.1	0.75	636,611	637,995	7.9	(14.5)	3.1	740	930	1,872	360	1,674	31	3,923			
11/20/13 15:00	(0.2)	15.3	2.0	0.75	642,594	637,991	7.8	(14.4)	3.1	729	949	1,872	359	1,655	32	3,983	6		
11/20/13 15:01	(0.3)	15.1	2.1	0.76	644,068	637,900	8.0	(14.5)	3.1	775	984	1,871	359	1,658	1	4,041			
11/20/13 15:02	(0.3)	15.1	2.1	0.75	631,990	637,937	7.7	(14.5)	3.1	753	1,022	1,870	360	1,659	1	4,101			
11/20/13 15:03	(0.4)	15.5	2.4	0.75	628,904	637,878	8.2	(14.5)	3.1	712	1,055	1,866	360	1,662	2	4,161			
11/20/13 15:04	(0.2)	14.7	2.1	0.75	644,068	637,911	8.0	(14.5)	3.1	717	1,077	1,873	361	1,645	2	4,219			
11/20/13 15:05	(0.2)	15.2	2.0	0.75	643,390	637,886	7.9	(14.5)	3.1	744	1,080	1,876	360	1,643	3	4,280			
11/20/13 15:06	(0.2)	15.7	2.1	0.75	638,341	637,988	7.5	(14.5)	3.1	737	1,064	1,873	360	1,644	3	4,340			
11/20/13 15:07	(0.2)	16.0	2.1	0.75	635,719	637,981	7.6	(14.4)	3.1	747	1,043	1,867	359	1,662	4	4,399			
11/20/13 15:08	(0.3)	15.4	2.1	0.76	642,106	638,005	7.8	(14.5)	3.1	776	1,016	1,867	359	1,641	4	4,458			
11/20/13 15:09	(0.3)	16.0	2.1	0.76	639,037	638,048	7.4	(14.5)	3.1	753	990	1,866	359	1,663	5	4,518			
11/20/13 15:10	(0.2)	15.6	2.0	0.75	641,856	637,985	7.4	(14.5)	3.1	733	965	1,867	360	1,660	5	4,578			
11/20/13 15:11	(0.2)	15.9	2.0	0.75	639,626	637,961	7.6	(14.5)	3.1	771	944	1,867	360	1,659	6	4,637			
11/20/13 15:12	(0.3)	16.1	2.0	0.74	630,510	637,978	7.4	(14.5)	3.1	759	928	1,865	360	1,657	6	4,697			
11/20/13 15:13	(0.3)	15.4	2.1	0.75	638,734	638,058	7.6	(14.5)	3.1	747	923	1,867	360	1,651	7	4,755			
11/20/13 15:14	(0.3)	16.0	2.0	0.75	633,257	637,967	7.7	(14.5)	3.1	702	937	1,866	360	1,651	7	4,816			
11/20/13 15:15	(0.2)	15.4	2.1	0.75	644,211	637,995	8.0	(14.5)	3.1	674	972	1,870	360	1,670	8	4,875			
11/20/13 15:16	(0.3)	14.7	2.0	0.75	637,110	637,993	7.7	(14.5)	3.1	665	1,012	1,883	360	1,647	8	4,935			
11/20/13 15:17	(0.3)	15.5	2.0	0.76	627,762	637,887	7.9	(14.5)	3.1	739	1,047	1,879	360	1,643	9	4,994			
11/20/13 15:18	(0.3)	15.2	2.0	0.76	625,729	637,881	8.0	(14.5)	3.1	703	1,077	1,872	360	1,657	10	5,054			
11/20/13 15:19	(0.3)	15.1	2.0	0.75	643,747	637,865	7.8	(14.5)	3.1	756	1,088	1,872	361	1,657	10	5,114			
11/20/13 15:20	(0.3)	15.6	2.0	0.75	644,728	637,871	7.6	(14.4)	3.1	748	1,078	1,868	361	1,639	11	5,173			
11/20/13 15:21	(0.3)	15.6	2.0	0.74	634,488	637,912	7.9	(14.5)	3.1	728	1,059	1,866	360	1,658	11	5,233			
11/20/13 15:22	(0.3)	15.8	2.0	0.75	644,978	637,955	7.9	(14.5)	3.1	685	1,032	1,868	359	1,658	12	5,290			
11/20/13 15:23	(0.2)	15.9	2.1	0.76	641,713	637,894	7.7	(14.5)	3.1	759	1,006	1,870	358	1,676	12	5,352			
11/20/13 15:24	(0.3)	15.8	2.0	0.76	634,952	637,955	8.0	(14.5)	3.1	742	981	1,870	359	1,674	13	5,409			
11/20/13 15:25	(0.3)	15.8	2.1	0.75	646,494	637,898	7.9	(14.4)	3.1	709	959	1,870	359	1,667	13	5,472			
11/20/13 15:26	(0.3)	16.2	2.1	0.75	638,020	637,903	7.8	(14.5)	3.1	764	941	1,868	360	1,668	14	5,530			
11/20/13 15:27	(0.3)	15.6	2.0	0.74	644,371	637,857	7.7	(14.4)	3.1	749	928	1,870	360	1,652	14	5,591			
11/20/13 15:28	(0.2)	16.0	2.1	0.74	645,584	637,852	7.7	(14.5)	3.1	735	925	1,870	360	1,675	15	5,649			
11/20/13 15:29	(0.3)	15.5	2.0	0.75	639,340	637,836	7.8	(14.5)	3.1	731	945	1,873	360	1,655	15	5,710			
11/20/13 15:30	(0.3)	15.3	2.1	0.74	635,755	637,768	8.0	(14.5)	3.1	723	983	1,873	360	1,657	16	5,769			
11/20/13 15:31	(0.3)	15.3	2.0	0.75	639,876	637,728	8.1	(14.5)	3.1	753	1,022	1,871	360	1,677	16	5,829			
11/20/13 15:32	(0.3)	15.0	2.0	0.76	647,279	637,762	7.7	(14.5)	3.1	743	1,056	1,870	360	1,656	17	5,888			
11/20/13 15:33	(0.3)	15.1	2.0	0.76	634,060	637,843	7.7	(14.5)	3.1	740	1,081	1,870	360	1,651	18	5,948			
11/20/13 15:34	(0.3)	15.4	2.0	0.76	647,011	637,913	7.8	(14.5)	3.1	793	1,084	1,869	359	1,672	18	6,007			
11/20/13 15:35	(0.3)	15.2	2.0	0.76	644,121	638,035	7.5	(14.5)	3.1	767	1,069	1,869	360	1,667	19	6,067			
11/20/13 15:36	(0.3)	16.0	2.0	0.75	646,405	638,043	7.6	(14.5)	3.1	778	1,047	1,865	360	1,662	19	6,126			
11/20/13 15:37	(0.3)	15.3	2.0	0.75	627,531	637,938	7.2	(14.5)	3.1	780	1,022	1,868	360	1,661	20	6,186			
11/20/13 15:38	(0.3)	16.1	2.0	0.74	635,525	637,843	7.8	(14.5)	3.1	760	997	1,866	360	1,656	20	6,246			
11/20/13 15:39	(0.3)	15.7	2.0	0.74	638,877	637,854	7.5	(14.5)	3.1	732	975	1,867	360	1,677	21	6,305			
11/20/13 15:40	(0.3)	15.7	2.0	0.75	638,769	637,770	7.7	(14.5)	3.1	766	955	1,868	360	1,654	21	6,364			
11/20/13 15:41	(0.3)	15.8	2.0	0.75	643,729	637,763	7.9	(14.5)	3.1	819	940	1,868							

11/20/13 16:22	(0.3)	15.5	1.9	0.75	631,651	638,062	7.5	(14.5)	3.1	691	418	1,880	359	1,655	12	6,805
11/20/13 16:23	(0.3)	16.3	1.9	0.75	651,561	638,279	7.5	(14.4)	3.1	683	414	1,880	359	1,656	12	6,805
11/20/13 16:24	(0.2)	16.0	1.9	0.75	639,430	638,403	7.3	(14.4)	3.1	697	410	1,875	359	1,653	13	6,805
11/20/13 16:25	(0.2)	15.9	1.9	0.75	642,088	638,407	7.6	(14.4)	3.1	663	406	1,874	358	1,659	13	6,805
11/20/13 16:26	(0.3)	16.0	1.9	0.75	639,287	638,339	7.2	(14.5)	3.1	691	402	1,877	357	1,664	14	6,805
11/20/13 16:27	(0.3)	15.8	1.9	0.75	636,486	638,344	7.6	(14.4)	3.1	674	399	1,874	356	1,663	14	6,805
11/20/13 16:28	(0.3)	16.0	2.0	0.75	637,128	638,311	7.6	(14.5)	3.1	720	396	1,874	357	1,645	15	6,805
11/20/13 16:29	(0.2)	15.6	1.9	0.75	638,002	638,291	7.7	(14.5)	3.1	674	397	1,873	357	1,642	15	6,805
11/20/13 16:30	(0.2)	16.0	1.9	0.75	630,421	638,402	7.4	(14.5)	3.1	714	398	1,875	357	1,659	16	6,805
11/20/13 16:31	(0.3)	15.7	1.9	0.75	648,706	638,323	7.6	(14.5)	3.1	701	399	1,873	357	1,637	16	6,805
11/20/13 16:32	(0.2)	15.7	1.9	0.75	631,402	638,393	7.5	(14.5)	3.1	721	402	1,871	357	1,637	17	6,805
11/20/13 16:33	(0.3)	16.1	1.9	0.75	635,826	638,386	7.2	(14.5)	3.1	713	404	1,867	357	1,656	18	6,805
11/20/13 16:34	(0.2)	15.6	2.0	0.75	635,166	638,294	7.8	(14.5)	3.1	712	406	1,869	356	1,656	18	6,805
11/20/13 16:35	(0.3)	15.7	1.9	0.75	636,201	638,253	7.6	(14.5)	3.1	766	408	1,872	356	1,632	19	6,805
11/20/13 16:36	(0.3)	15.6	2.0	0.75	627,548	638,163	7.7	(14.5)	3.1	710	410	1,872	356	1,633	19	6,805
11/20/13 16:37	(0.2)	16.0	1.9	0.74	649,402	638,076	7.7	(14.5)	3.1	738	411	1,871	357	1,637	20	77
11/20/13 16:38	(0.3)	16.0	1.9	0.75	644,532	638,085	7.7	(14.5)	3.1	781	410	1,869	357	1,639	20	44
11/20/13 16:39	(0.3)	15.5	1.9	0.74	637,039	638,144	7.6	(14.4)	3.1	737	401	1,868	358	1,644	21	103
11/20/13 16:40	(0.3)	16.2	1.9	0.74	636,647	638,149	7.8	(14.5)	3.1	803	391	1,865	359	1,626	21	162
11/20/13 16:41	(0.2)	15.6	1.9	0.74	639,661	638,062	7.8	(14.4)	3.1	772	394	1,868	360	1,631	22	222
11/20/13 16:42	(0.3)	14.9	1.9	0.74	640,179	638,081	7.9	(14.4)	3.1	744	426	1,878	360	1,636	22	282
11/20/13 16:43	(0.3)	14.8	1.9	0.75	633,096	638,119	7.7	(14.4)	3.1	799	472	1,882	360	1,634	23	341
11/20/13 16:44	(0.3)	14.6	2.0	0.76	641,838	638,158	7.7	(14.5)	3.1	771	523	1,882	360	1,635	23	401
11/20/13 16:45	(0.3)	15.0	1.9	0.76	643,158	638,176	7.5	(14.5)	3.1	766	576	1,876	360	1,634	24	459
11/20/13 16:46	(0.3)	14.9	1.9	0.76	635,737	638,108	7.8	(14.5)	3.1	799	626	1,873	359	1,634	24	519
11/20/13 16:47	(0.3)	14.3	1.9	0.76	639,073	638,103	7.8	(14.5)	3.1	802	672	1,877	359	1,637	25	579
11/20/13 16:48	(0.3)	14.7	1.9	0.75	637,467	638,228	7.8	(14.5)	3.1	797	717	1,876	359	1,657	25	639
11/20/13 16:49	(0.3)	14.5	1.9	0.75	636,308	638,153	7.6	(14.4)	3.1	778	758	1,877	359	1,637	26	699
11/20/13 16:50	(0.3)	14.8	1.9	0.75	635,969	638,236	7.4	(14.5)	3.1	788	800	1,875	359	1,651	27	758
11/20/13 16:51	(0.3)	14.2	1.9	0.74	632,383	638,125	8.0	(14.5)	3.1	846	838	1,882	360	1,651	27	817
11/20/13 16:52	(0.3)	14.6	1.9	0.75	643,997	638,152	7.7	(14.5)	3.1	763	869	1,879	360	1,651	28	878
11/20/13 16:53	(0.3)	14.8	1.9	0.75	636,361	638,154	7.7	(14.5)	3.1	739	896	1,876	360	1,647	28	935
11/20/13 16:54	(0.3)	14.3	1.9	0.75	638,431	638,119	7.6	(14.4)	3.1	771	928	1,880	359	1,651	29	997
11/20/13 16:55	(0.3)	14.5	1.9	0.76	636,094	637,963	8.0	(14.5)	3.1	801	960	1,879	359	1,646	29	1,056
11/20/13 16:56	(0.3)	14.4	1.9	0.75	633,721	637,963	8.2	(14.4)	3.1	745	987	1,877	359	1,647	30	1,115
11/20/13 16:57	(0.3)	14.5	1.9	0.75	642,141	637,953	7.9	(14.4)	3.1	742	1,013	1,878	360	1,647	30	1,175
11/20/13 16:58	(0.3)	14.7	1.9	0.75	644,211	637,928	7.7	(14.5)	3.1	813	1,038	1,877	360	1,644	31	1,234
11/20/13 16:59	(0.4)	14.4	2.0	0.74	624,658	637,918	7.7	(14.4)	3.1	758	1,063	1,875	361	1,656	31	1,294
11/20/13 17:00	(0.3)	14.5	1.9	0.74	649,384	637,824	8.1	(14.5)	3.1	826	1,084	1,875	360	1,656	32	1,354
11/20/13 17:01	(0.4)	14.4	1.9	0.75	631,223	637,868	8.1	(14.4)	3.1	774	1,103	1,874	360	1,633	1	1,413
11/20/13 17:02	(0.3)	14.7	2.0	0.75	635,095	637,840	8.3	(14.4)	3.1	795	1,113	1,871	360	1,634	1	1,471
11/20/13 17:03	(0.4)	15.1	2.0	0.75	631,170	637,791	7.9	(14.5)	3.1	802	1,126	1,868	359	1,654	2	1,531
11/20/13 17:04	(0.3)	15.1	2.0	0.76	635,166	637,656	7.7	(14.5)	3.1	805	1,117	1,867	359	1,652	2	1,590
11/20/13 17:05	(0.3)	15.4	2.0	0.76	634,577	637,706	7.8	(14.4)	3.1	780	1,089	1,868	358	1,651	3	1,651
11/20/13 17:06	(0.3)	15.9	2.1	0.76	626,460	637,747	7.7	(14.5)	3.1	819	1,059	1,866	358	1,651	3	1,712
11/20/13 17:07	(0.2)	15.3	2.0	0.74	627,477	637,746	8.1	(14.4)	3.1	796	1,032	1,870	358	1,651	4	1,771
11/20/13 17:08	(0.3)	15.8	2.0	0.75	651,632	637,628	7.4	(14.5)	3.1	789	1,011	1,868	359	1,634	4	1,831
11/20/13 17:09	(0.3)	15.4	2.0	0.72	649,634	637,529	7.4	(14.5)	3.1	779	994	1,866	361	1,653	5	1,890
11/20/13 17:10	(0.3)	15.5	2.1	0.74	643,889	637,653	7.3	(14.5)	3.1	831	974	1,865	363	1,651	5	1,950
11/20/13 17:11	(0.3)	15.4	2.0	0.74	637,878	637,761	7.6	(14.5)	3.1	796	955	1,866	364	1,631	6	2,009
11/20/13 17:12	(0.2)	16.0	2.0	0.75	639,037	637,792	7.6	(14.5)	3.1	809	935	1,863	364	1,654	6	2,068
11/20/13 17:13	(0.2)	15.6	2.0	0.74	636,022	637,836	7.9	(14.5)	3.1	755	918	1,863	363	1,631	7	2,128
11/20/13 17:14	(0.2)	16.0	2.0	0.75	626,389	637,827	7.8	(14.5)	3.1	767	916	1,862	361	1,630	7	2,188
11/20/13 17:15	(0.3)	15.0	2.0	0.76	640,589	637,719	7.6	(14.5)	3.1	741	947	1,869	359	1,632	8	2,247
11/20/13 17:16	(0.3)	14.8	2.0	0.75	621,661	637,774	7.9	(14.5)	3.1	752	991	1,878	359	1,651	8	2,306
11/20/13 17:17	(0.4)	14.7	2.0	0.75	646,619	637,781	7.6	(14.5)	3.1	731	1,042	1,878	360	1,635	9	2,365
11/20/13 17:18	(0.3)	15.0	2.1	0.74	637,913	637,780	7.8	(14.5)	3.1	788	1,078	1,871	362	1,638	10	2,426
11/20/13 17:19	(0.4)	15.3	2.0	0.73	636,504	637,887	7.8	(14.4)	3.1	781	1,092	1,865	363	1,635	10	2,483
11/20/13 17:20	(0.3)	15.0	2.1	0.76	637,039	637,889	7.7	(14.5)	3.1	764	1,084	1,864	363	1,637	11	2,545
11/20/13 17:21	(0.3)	15.4	2.0	0.75	635,202	638,018	7.6	(14.5)	3.1	800	1,060	1,866	361	1,635	11	2,604
11/20/13 17:22	(0.4)	15.8	2.0	0.75	649,616	637,917	7.7	(14.5)	3.1	795	1,035	1,865	360	1,634	12	2,664
11/20/13 17:23	(0.3)	15.5	2.0	0.77	637,574	637,945	7.6	(14.5)	3.1	777	1,011	1,866	359	1,637	12	2,722
11/20/13 17:24	(0.3)	15.8	2.0	0.77	638,859	637,742	7.9	(14.5)	3.1	802	985	1,867	358	1,638	13	2,784
11/20/13 17:25	(0.3)	15.9	2.0	0.75	639,251	637,559	7.5	(14.4)	3.1	790	963	1,867	359	1,642	13	2,842
11/20/13 17:26	(0.3)	15.6	2.0	0.74	640,											





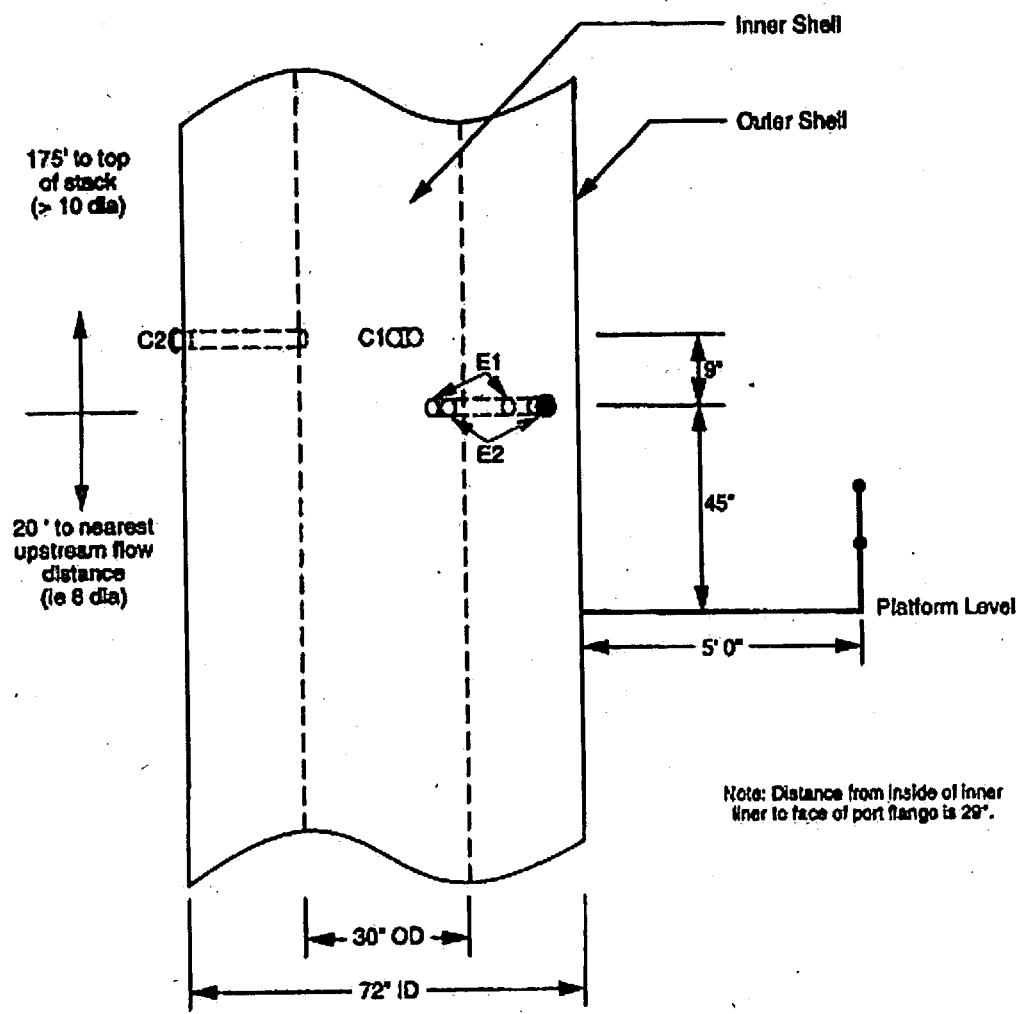
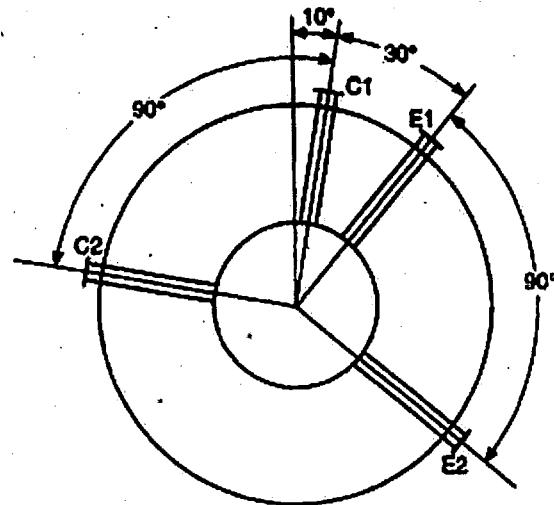




*Schematic of the  
Test Location*

## Rotary Kiln Incinerator Exhaust Stack

General Dynamics – Carthage, MO



## Particulate Traverse Point Locations for Circular Stacks

Facility: General Dynamics

Source Identification: Rotary Kiln Incinerator

Stack Diameter: 30 inches

Sampling Locations: 8.00 diameters downstream  
70.0 diameters upstream

Minimum Number of Traverse points  
as specified by EPA Method 1: 12

Number of traverse points sampled: 12

Traverse Point Number	Percent of Stack Diameter From Inside Wall	Distance in Inches From Inside Wall*
1	4.4	1.3
2	14.6	4.4
3	29.6	8.9
4	70.4	21.1
5	85.4	25.6
6	95.6	28.7

\*Traverse points located within 1.00" to the stack wall for stacks having an inside diameter greater than 24" will be relocated as well as traverse points located within 0.50 inches to the stack wall on stacks with a 24" ID or less to meet criteria.

## *Field Data and Calculations*

**Summary of Results - PCDD/PCDF**  
**General Dynamics**  
**Rotary Kiln Incinerator - Building 6**  
**Carthage, Missouri**

Sample Volume	96.299 dscf	Volumetric Flow Rate	6412 DSCFM
Sample Volume	2.73 m <sup>3</sup>		

<u>Run 2</u>	<u>Sample Collected</u>	<u>EPA</u>	<u>Toxic Equivalency<sup>a</sup></u>
Isomer	(pg)	Equivalency Factor	(ng/dscm)
2378-TCDD	5.0	1	1.8E-03
12378-PeCDD	11.0	0.5	2.0E-03
123478-HxCDD	5.0	0.1	1.8E-04
123678-HxCDD	8.0	0.1	2.9E-04
123789-HxCDD	13.0	0.1	4.8E-04
1234678-HpCDD	29.0	0.01	1.1E-04
Total OCDD	67.0	0.001	2.5E-05
2378-TCDF	77	0.1	2.8E-03
12378-PeCDF	58	0.05	1.1E-03
23478-PeCDF	90	0.5	1.7E-02
123478-HxCDF	148	0.1	5.4E-03
123678-HxCDF	86	0.1	3.2E-03
234678-HxCDF	54	0.1	2.0E-03
123789-HxCDF	18	0.1	6.6E-04
1234678-HpCDF	209.0	0.01	7.7E-04
1234789-HpCDF	62	0.01	2.3E-04
Total OCDF	139	0.001	5.1E-05
<b>TOTAL TEQs (ng/m<sup>3</sup>)</b>			0.038
<b>TOTAL TEQs (ng/m<sup>3</sup> @ 7 % O<sub>2</sub>)</b>			0.096

<sup>a</sup>U.S EPA (1989) Toxic Equivalency Factor

<sup>b</sup>PCDD/PCDF Standard = 0.4 ng/dscm

**Summary of Results - PCDD/PCDF**  
**General Dynamics**  
**Rotary Kiln Incinerator - Building 6**  
**Carthage, Missouri**

Sample Volume	95.782 dscf	Volumetric Flow Rate	6356 DSCFM
Sample Volume	2.71 m <sup>3</sup>		

<b>Run 3</b> Isomer	<u>Sample Collected</u>	EPA	<u>Toxic Equivalency<sup>a</sup></u>
	(pg)	Equivalency Factor	(ng/dscm)
2378-TCDD	7.0	1	2.6E-03
12378-PeCDD	12	0.5	2.2E-03
123478-HxCDD	6	0.1	2.2E-04
123678-HxCDD	9	0.1	3.3E-04
123789-HxCDD	14	0.1	5.2E-04
1234678-HpCDD	26	0.01	9.6E-05
Total OCDD	70	0.001	2.6E-05
2378-TCDF	125	0.1	4.6E-03
12378-PeCDF	55	0.05	1.0E-03
23478-PeCDF	90	0.5	1.7E-02
123478-HxCDF	82	0.1	3.0E-03
123678-HxCDF	83	0.1	3.1E-03
234678-HxCDF	57	0.1	2.1E-03
123789-HxCDF	17	0.1	6.3E-04
1234678-HpCDF	217.0	0.01	8.0E-04
1234789-HpCDF	65	0.01	2.4E-04
Total OCDF	108	0.001	4.0E-05
<b>TOTAL TEQs (ng/m<sup>3</sup>)</b>			0.038
<b>TOTAL TEQs (ng/m<sup>3</sup> @ 7 % O<sub>2</sub>)</b>			0.099

<sup>a</sup> U.S EPA (1989) Toxic Equivalency Factor

<sup>b</sup> PCDD/PCDF Standard = 0.4 ng/dscm



**Summary of Results - PCDD/PCDF**  
**General Dynamics**  
**Rotary Kiln Incinerator - Building 6**  
**Carthage, Missouri**

Sample Volume	96.450 dscf	Volumetric Flow Rate	6403 DSCFM
Sample Volume	2.73 m <sup>3</sup>		

<b>Run 33</b>	<b>Sample Collected</b>	<b>EPA</b>	<b>Toxic Equivalency<sup>a</sup></b>
Isomer	( $\mu$ g)	Equivalency Factor	(ng/dscm)
2378-TCDD	8.0	1	2.9E-03
12378-PeCDD	14.0	0.5	2.6E-03
123478-HxCDD	7.0	0.1	2.6E-04
123678-HxCDD	11.0	0.1	4.0E-04
123789-HxCDD	17.0	0.1	6.2E-04
1234678-HpCDD	38.0	0.01	1.4E-04
Total OCDD	62.0	0.001	2.3E-05
2378-TCDF	178	0.1	6.5E-03
12378-PeCDF	70	0.05	1.3E-03
23478-PeCDF	100	0.5	1.8E-02
123478-HxCDF	178	0.1	6.5E-03
123678-HxCDF	107	0.1	3.9E-03
234678-HxCDF	81.0	0.1	3.0E-03
123789-HxCDF	23.0	0.1	8.4E-04
1234678-HpCDF	246.0	0.01	9.0E-04
1234789-HpCDF	82.0	0.01	3.0E-04
Total OCDF	109.0	0.001	4.0E-05
<b>TOTAL TEQs (ng/m<sup>3</sup>)</b>			0.049
<b>TOTAL TEQs (ng/m<sup>3</sup> @ 7 % O<sub>2</sub>)</b>			0.126

<sup>a</sup> U.S. EPA (1989) Toxic Equivalency Factor

<sup>b</sup> PCDD/PCDF Standard = 0.4 ng/dscm

**Test Data Summary and Calculations**  
**General Dynamics**  
**Rotary Kiln Incinerator - Building 6**  
**Carthage, Missouri**

<u>Parameter</u>	<u>Run 2</u>	<u>Run 3</u>	<u>Run 4</u>
Run Date	20Nov13	20Nov13	21Nov13
Start/Stop Time	1449-1754	1818-2122	0918-1224
Duration of Run, Minutes	180	180	180
Ave. Nozzle Diameter, inches	0.265	0.265	0.265
Pitot Calibration Factor, CF	0.84	0.84	0.84
Meter Gamma	1.020	1.020	1.020
Meter Delta H, inches of H2O	1.990	1.990	1.990
Stack Diameter, inches	30	30	30
Rectangular Width, inches		0	0
Rectangular Length, inches		0	0
Stack Area, sq.ft.	4.91	4.91	4.91
Barometric Pressure, inches of Hg	28.87	28.87	29.03
Static Pressure, inches of H2O	-0.41	-0.36	-0.38
<u>Dry Gas Meter Sample Volume, (VM)ft3</u>			
Initial	83.319	180.474	277.932
Final	180.329	276.701	372.704
Actual Volume Collected	97.01	96.227	94.772
Ave. Stack Temperature, Ts(F)	221.7	223.3	215.2
Ave. Meter Temperature, Tm(F)	64.7	63.3	54.6
Ave. Run Delta H, inches of H2O	0.93	0.92	0.92
Ave. Square Root of Delta P	0.5656	0.5614	0.5606
<u>Moisture Data</u>			
Volume of water collected, mls	614.7	610.8	618.4
Silica Gel, grams	28.6	30.6	28
Total Collected, mls	643.3	641.4	646.4
<u>ORSAT Data</u>			
%O2	15.50	15.60	15.60
%CO2	3.78	3.60	3.50
%CO			
<u>Calculations</u>			
Vw(std), scf =	30.280	30.191	30.426
Vm(std), dscf =	96.299	95.782	96.450
Bws=	0.239	0.240	0.240
Md=	29.22	29.20	29.18
Ms=	26.54	26.52	26.50
Vs, ft/sec =	38.3	38.1	37.7
Qs, acfm =	11,288	11,222	11,112
Qs(std), dscfm =	6,412	6,356	6,403
Isokinetic Sampling Rate, %	107.0	107.3	107.3

Where:

An = area of the nozzle

As = area of the stack

Vw(std) = volume of water vapor in gas, standard conditions = 0.04707\*Vlc

Vm(std) = vol. of gas sampled, standard conditions = 17.647 x Vm x gamma x [Pb + (dH/13.6)]/Tm(R)

Bws = water vapor in gas stream, proportion by volume = Vw(std)/(Vm(std) + Vw(std))

Md = molecular weight of stack gas, dry basis = (0.44 x%CO2) + (0.32 x%O2) + [0.28 x (%N2 + %CO)]

Ms = molecular weight of stack gas, wet basis = [Md x (1-Bws)] + (18.0 x Bws)

Vs = stack gas velocity = 85.49 x Cp x [avg. Sq.Rt. dP] x [Sq.Rt. (Ts(R)) / (Ms x Ps)]

Qs = stack gas flow rate = Vs x As x 60

Qs(std) = stack gas flow rate, standard conditions = Qs x (1-Bws) x (528/(Ts(R))) x (Ps/29.92)

Isokinetic sampling rate = {(Ts(R)) x [(0.00267 x Vlc) + (Vm(std)/17.647)] x 100}/{(Time x vs x Ps x An x 60)}

**Field Data Summary**  
**General Dynamics**  
**Rotary Kiln Incinerator - Building 6**  
**Carthage, Missouri**

Traverse Point	Stack	Run 2				Run 3				Run 4				
		Temp(F)	Delta P	Tm(F)		Stack Temp(F)	Delta P	Tm(F)		Stack Temp(F)	Delta P	Tm(F)		
				In	out			In	out			In	out	
A1	216	0.30	0.87	67	62	0.5477		222	0.32	0.93	64	61	0.5657	
1	221	0.31	0.90	66	62	0.5568		221	0.31	0.90	64	61	0.5568	
1	220	0.30	0.87	66	62	0.5477		220	0.32	0.93	65	61	0.5657	
2	222	0.33	0.96	67	62	0.5745		222	0.34	0.99	66	61	0.5831	
2	222	0.34	0.99	68	62	0.5831		222	0.34	0.99	66	61	0.5831	
2	222	0.35	1.00	68	62	0.5916		222	0.33	0.96	66	61	0.5745	
3	223	0.34	0.99	69	62	0.5831		222	0.32	0.93	66	61	0.5657	
3	224	0.35	1.00	69	63	0.5916		222	0.34	0.99	68	61	0.5831	
3	224	0.35	1.00	70	63	0.5916		224	0.34	0.99	66	61	0.5831	
4	223	0.34	0.99	70	63	0.5831		224	0.33	0.96	68	61	0.5745	
4	225	0.33	0.96	69	63	0.5745		225	0.33	0.96	66	60	0.5745	
4	225	0.33	0.96	71	63	0.5745		225	0.33	0.96	66	60	0.5745	
5	223	0.27	0.79	71	64	0.5196		224	0.32	0.93	66	60	0.5657	
5	223	0.28	0.81	70	63	0.5292		224	0.32	0.93	66	60	0.5657	
5	223	0.29	0.84	69	63	0.5385		224	0.32	0.93	65	60	0.5657	
6	220	0.24	0.70	69	63	0.4899		223	0.26	0.76	65	60	0.5099	
6	222	0.24	0.70	69	63	0.4899		223	0.26	0.76	65	60	0.5099	
6	220	0.22	0.64	68	62	0.4690		222	0.26	0.76	65	60	0.5099	
B1	221	0.30	0.87	61	59	0.5477		224	0.34	0.99	62	60	0.5831	
1	222	0.31	0.90	62	59	0.5568		224	0.33	0.96	65	60	0.5745	
1	222	0.31	0.90	63	59	0.5568		223	0.33	0.96	66	60	0.5745	
2	220	0.30	0.87	65	59	0.5477		224	0.34	0.99	66	60	0.5831	
2	220	0.30	0.87	65	60	0.5477		224	0.35	1.00	66	60	0.5916	
2	221	0.31	0.90	66	60	0.5568		223	0.35	1.00	66	61	0.5916	
3	223	0.39	1.10	67	60	0.6245		223	0.34	0.99	66	60	0.5831	
3	223	0.37	1.10	67	61	0.6083		224	0.34	0.99	67	61	0.5831	
3	222	0.39	1.10	68	61	0.6245		224	0.34	0.99	67	61	0.5831	
4	224	0.37	1.10	68	61	0.6083		224	0.33	0.96	67	61	0.5745	
4	224	0.37	1.10	68	62	0.6083		224	0.32	0.93	67	61	0.5657	
4	224	0.37	1.10	69	62	0.6083		226	0.32	0.93	67	61	0.5657	
5	219	0.33	0.96	69	62	0.5745		224	0.29	0.84	67	61	0.5385	
5	219	0.32	0.93	69	62	0.5657		224	0.29	0.84	67	61	0.5385	
5	220	0.33	0.96	69	62	0.5745		224	0.29	0.84	67	61	0.5385	
6	219	0.33	0.96	69	62	0.5745		223	0.28	0.81	67	61	0.5292	
6	220	0.32	0.93	69	62	0.5657		223	0.25	0.73	66	61	0.5000	
6	219	0.33	0.96	69	62	0.5745		223	0.25	0.73	66	61	0.5000	
						0.0000						0.0000		
Average	222	0.32	0.93	68	62	0.5656		223	0.32	0.92	66	61	0.5614	
													0.0000	

EPA Isokinetic Field Sheet

Methods Performed

M23

Client General Dynamics  
 Location Carthage, MO  
 Source Bldg 6  
 Date 11/08/15  
 Operators SMb/BGardiner  
 Start Time 1449  
 End Time

Run Number 2  
 Stack Diameter .30  
 Barometric Pres. 28.87  
 Static Pressure -0.41  
 Meter Box # 7  
 Meter delta H 1.99  
 Meter Gamma 1.022

Pitot Number PS-A  
 Pitot Coefficient 0.84  
 Stack TC I.D. PS-4  
 Oven Box I.D. 4B-1  
 Impinger Out I.D. IO-11  
 Nozzle Size 0.265  
 XAD Trap I.D. M23

Leak Check Rates						
	Sample Rate in. cfm	Pitot				
Initial	<u>10</u>	<u>0.007</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Mid	<u>8</u>	<u>0.007</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Mid						
Final	<u>6</u>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

Sample Point	Sample Time (min)	Velocity Head (in. H <sub>2</sub> O)	Orifice Setting (in. H <sub>2</sub> O)	Meter Volume (ft <sup>3</sup> )	Temperature Readings in Degrees Farenheit							Comments/Notes	
					Stack	Probe	Oven Box	Impinger	Aux	Meter Inlet	Meter Outlet	Vacuum (in. hg)	
B1	0	0.30	0.87	83.319	221	233	250	53	50	61	59	4.0	K = 2.91
1	5	0.31	0.90	85.95	222	230	253	52	50	62	59	4.0	
1	10	0.31	0.90	88.61	222	232	255	50	49	63	59	4.5	
2	15	0.30	0.87	91.25	220	260	253	49	50	65	59	4.5	
2	20	0.30	0.87	93.845	220	259	252	50	51	65	60	4.5	
2	25	0.31	0.90	96.43	221	258	252	51	51	66	60	4.5	
3	30	0.39	1.1	99.06	223	257	251	52	52	67	60	5.5	
3	35	0.37	1.1	102.02	223	259	250	52	49	67	61	5.5	
3	40	0.39	1.1	104.96	222	259	252	51	49	68	61	5.5	
4	45	0.37	1.1	107.92	224	256	251	51	48	68	61	5.5	
4	50	0.37	1.1	110.86	224	249	252	51	48	68	60	5.5	
4	55	0.37	1.1	113.80	224	251	251	51	49	69	62	5.5	
5	1:00	0.33	0.96	116.95	219	249	249	53	53	69	62	5.0	
5	1:05	0.32	0.93	119.50	219	251	250	55	54	69	62	5.0	
5	1:10	0.33	0.96	122.20	220	244	248	56	56	69	62	5.0	
6	1:15	0.33	0.96	124.93	219	239	251	57	58	69	62	5.0	
6	1:20	0.32	0.93	127.86	220	242	252	60	60	69	62	5.0	
6	1:25	0.33	0.96	130.37	219	235	252	61	62	69	62	5.0	Step 1619 Restart 1624
	1:30			133.071									
A1	1:30	0.30	0.87	133.149	216	245	250	58	55	67	62	4.0	
1	1:35	0.31	0.90	135.76	221	256	251	55	48	66	62	4.5	
1	1:40	0.30	0.87	138.39	220	259	252	52	47	66	62	4.5	
2	1:45	0.33	0.96	140.01	222	254	252	51	48	67	62	4.5	
2	1:50	0.34	0.99	143.74	222	239	251	50	49	68	62	5.0	
2	1:55	0.35	1.0	146.8	222	242	251	50	48	68	62	5.0	
3	2:00	0.34	0.99	149.27	223	245	251	50	49	69	62	5.0	
3	2:05	0.35	1.0	152.04	224	250	251	50	51	69	63	5.0	
3	2:10	0.35	1.0	154.83	224	258	250	52	52	70	63	5.0	
4	2:15	0.34	0.99	157.62	223	251	249	54	55	70	63	5.5	

Impinger Data (vol)		
#	Initial	Final
1	0	
2	100	
3	100	
4	0	
5	56	
6		

Silica Gel Data (gm)		
#	Initial	Final
1		
2		

Moisture Gain		
	ml.	gm
		Total

Filter Data		
#	Number	Tare
1		
2		
3		

Molecular Weight Data (%)		
#	O <sub>2</sub>	CO <sub>2</sub>
1	15.5	3.78
2		
3		
Avg		



EPA Isokinetic Field Sheet

Methods Performed

M23

Cient General Dynamics  
Location Carthage, MO  
Source Bidg 6  
Date 11/20/13  
Operators SM 16 / B Gwinne  
Start Time 1818  
End Time

Run Number 3  
Stack Diameter 36"  
Barometric Pres. 28.87  
Static Pressure -0.36  
Meter Box # 7  
Meter delta H 1.99  
Meter Gamma 1.022

Pilot Number PS-A  
Pilot Coefficient 0.84  
Stack TC I.D. PS-A  
Oven Box I.D. 14B-1  
Impinger Out I.D. 10-11  
Nozzle Size 0.265  
XAD Trap I.D. M23

Leak Check Rates		
	Sample Rate in. cfm	Pilot + -
Initial	10 0.005 ✓ ✓	
Mid		
Mid		
Final		

Sample Point	Sample Time (min)	Velocity Head (in. H <sub>2</sub> O)	Orifice Setting (in. H <sub>2</sub> O)	Meter Volume (ft <sup>3</sup> )	Temperature Readings in Degrees Fahrenheit							Comments/Notes
					Stack	Probe	Oven Box	Impinger	Aux	Meter Inlet	Meter Outlet	Vacuum (in. hg)
41 0	0.32	0.93	180.474	222	227	256	52	40	64	61	8.0	K=2.91
1 5	0.31	0.90	183.15	221	233	255	47	40	64	61	8.0	
1 10	0.32	0.93	135.83	220	252	254	45	40	65	61	8.0	
2 15	0.34	0.99	188.46	222	343	252	47	42	66	61	9.0	Paused a)
2 20	0.34	0.99	191.23	222	240	252	47	42	66	61	9.0	1945
2 35	0.33	0.96	194.01	222	235	251	48	42	66	61	9.0	
3 30	0.32	0.93	196.73	222	234	252	48	41	68	61	8.5	Restart
3 35	0.34	0.99	199.41	222	233	252	49	43	66	61	9.0	201952
3 40	0.34	0.99	202.16	224	227	252	50	46	68	61	9.0	
4 45	0.33	0.96	204.939	224	232	250	52	47	66	61	9.0	
4 50	0.33	0.96	207.703	225	231	251	54	47	66	60	9.0	
4 55	0.33	0.96	210.499	225	230	247	55	50	66	60	9.0	
5 1:00	0.32	0.93	213.154	224	241	251	57	51	66	60	9.0	
5 1:05	0.32	0.93	215.375	224	250	251	58	49	65	60	9.0	
5 1:10	0.32	0.93	218.579	224	251	251	58	45	65	60	9.0	
6 1:15	0.36	0.76	221.2	223	252	250	55	45	65	60	8.0	
6 1:20	0.36	0.76	224	223	248	251	54	46	65	60	8.0	
6 1:25	0.36	0.76	226.4	222	249	250	55	47	65	60	8.0	
130			228.767									
B1	130	0.34	0.99	228.767	224	251	251	53	50	60	60	9.0
1	135	0.33	0.96	231.435	224	249	251	53	48	65	60	9.0
1	140	0.33	0.96	234.175	223	250	252	54	48	66	60	9.5
2	145	0.34	0.99	236.88	224	249	250	54	47	66	60	9.5
2	150	0.35	1.0	239.64	224	250	251	53	47	66	60	9.5
2	155	0.35	1.0	243.41	223	250	252	53	49	66	61	9.5
3	200	0.34	0.99	245.17	223	251	251	54	47	66	60	9.5
3	205	0.34	0.99	247.95	224	250	249	50	46	67	61	9.5
3	210	0.34	0.99	250.726	224	250	251	50	46	67	61	9.5

Impinger Data (vol)		
#	Initial	Final
1	0	
2	100	
3	100	
4	0	
5	56	
6		

Silica Gel Data (gm)		
#	Initial	Final
1		
2		

Moisture Gain		
	ml.	gm.
Total		

Filter Data		
#	Number	Tare
1		
2		
3		

Molecular Weight Data (%)		
#	O <sub>2</sub>	CO <sub>2</sub>
1	15.6	3.6
2		
3		
Avg		



EPA Isokinetic Field Sheet

Methods Performed

Method 23

Client General Dynamics  
 Location Carthage, MO  
 Source Building 6  
 Date 11-31-2013  
 Operators CW/SM/BG  
 Start Time 0918  
 End Time 1224

Run Number 56  
 Stack Diameter 30"  
 Barometric Pres. 29.03  
 Static Pressure -0.33  
 Meter Box # MB7  
 Meter delta H 1.99  
 Meter Gamma 1.022

Pilot Number PS A  
 Pilot Coefficient 0.84  
 Stack TC I.D. PS A  
 Oven Box I.D. 035  
 Impinger Out I.D. 5011  
 Nozzle Size 0.265  
 XAD Trap I.D.

$$K = 0.91$$

Sample Point	Sample Time (min)	Velocity Head (in. H <sub>2</sub> O)	Orifice Setting (in. H <sub>2</sub> O)	Meter Volume (ft <sup>3</sup> )	Temperature Readings in Degrees Farenheit						Comments/Notes	
					Stack	Probe	Oven Box	Impinger	Aux	Meter Inlet	Meter Outlet	
A 1	0	0.30	0.97	277.973	209	241	253	43	39	58	48	2
1	5	0.30	0.97	280.3	-	209	251	42	40	59	48	4
1	10	0.30	0.97	283.002	209	250	252	43	41	50	48	5
2	15	0.33	0.94	285.549	213	252	253	42	43	52	49	5
2	20	0.33	0.94	283.238	213	250	252	43	45	54	49	5
3	25	0.34	0.99	290.514	213	251	251	44	45	55	50	5
3	30	0.34	0.99	293.653	213	250	251	45	46	55	54	5
3	35	0.34	0.99	296.402	215	250	251	47	46	56	50	5
3	40	0.34	0.99	294.144	215	248	249	48	47	56	50	5
4	45	0.34	0.99	301.878	215	249	251	49	47	57	50	5
4	50	0.34	0.99	304.549	216	250	253	51	51	58	51	5
4	55	0.34	0.99	307.334	216	250	251	52	52	57	51	5
5	60	0.31	0.90	310.027	215	251	252	53	54	53	51	5
5	1:05	0.31	0.90	310.645	216	250	249	55	57	54	53	5
5	1:10	0.31	0.90	315.579	216	250	253	56	54	58	53	5
6	1:15	0.23	0.81	317.700	215	251	252	56	53	58	51	5.5
6	1:20	0.23	0.81	322.555	214	252	250	58	54	56	52	4.5
6	1:25	0.27	0.79	323.315	214	250	252	59	60	58	52	
	1:30			325.354								
B 1	1:30	0.32	0.93	325.354	213	243	251	53	43	54	52	5
1	1:35	0.33	0.93	328.007	212	250	253	47	42	57	52	5
1	1:40	0.32	0.93	330.647	213	250	251	46	43	58	53	5
2	1:45											
2	1:50											
2	1:55											
2	2:00											
3	2:05											
3	2:10											

Leak Check Rates		
	Sample Rate in. cfm	Pilot + -
Initial	13	0.602 ✓✓
Mid		
Mid		
Final	10	0.601 ✓✓

Impinger Data (vol)		
#	Initial	Final
1	0	
2	100	
3	100	
4	0	
5	5G	
6		

Silica Gel Data (gm)		
#	Initial	Final
1		
2		

Moisture Gain		
	ml.	gm
Total		

Filter Data		
#	Number	Tare
1		
2		
3		

Molecular Weight Data (%)		
#	O <sub>2</sub>	CO <sub>2</sub>
1	15.6	3.5
2		
3		
Avg		

 O'BRIEN & GERE

# EPA Isokinetic Field Sheet

Methods Performed Method 27

Client General Dynamics  
 Location Carthage, MO  
 Source Building 6  
 Date 11-21-2013  
 Operators CW/SM/RG  
 Start Time 09:18  
 End Time 10:34

Run Number 4  
 Stack Diameter 36" 16  
 Barometric Pres. 29.03  
 Static Pressure -0.33  
 Meter Box # HB-7  
 Meter delta H 1.99  
 Meter Gamma 1.023

Pitot Number PSA  
 Pitot Coefficient 0.84  
 Stack TC I.D. PSA  
 Oven Box I.D. 0.31  
 Impinger Out I.D. 30.11  
 Nozzle Size 0.565  
 XAD Trap I.D.

Leak Check Rates		
	Sample Rate in. cfm	Pitot +
Initial	13 0.023	✓ ✓
Mid		
Mid		
Final	10 0.001	✓ ✓

X = 2.91

Sample Point	Sample Time (min)	Velocity Head (in. H <sub>2</sub> O)	Orifice Setting (in. H <sub>2</sub> O)	Meter Volume (ft <sup>3</sup> )	Temperature Readings in Degrees Farenheit						Comments/Notes	
					Stack	Probe	Oven Box	Impinger	Aux	Meter Inlet	Meter Outlet	
1 1:45	0.35	1.02	333.369	215 249 251 47	44	54	53	5				
2 1:50	0.35	1.02	335.973	215 250 250 47	45	54	53	5				
2 1:55	0.35	1.02	333.742	216 249 250 47	45	54	53	5				
3 2:00	0.33	0.56	341.502	215 249 251 48	47	60	53	5				
3 2:05	0.34	0.49	340.296	215 249 252 49	48	60	53	5				
3 2:10	0.35	1.02	346.919	215 249 250 48	50	60	54	5.5	1045	End		
4 2:15	0.31	0.98	348.704	215 250 251 52	52	61	54	5.5				part change
4 2:20	0.33	0.56	353.477	215 247 250 52	53	61	54	5.5				
4 2:25	0.33	0.96	355.2	214 249 251 49	50	61	54	5.5				Restart
5 2:30	0.30	0.57	357-	215 250 251 49	47	61	55	5				1054
5 2:35	0.38	0.51	360.300	215 249 251 49	47	61	55	5				
5 2:40	0.35	0.51	365.113	215 250 250 49	47	61	54	4.5				
6 2:45	0.25	0.73	365.663	215 250 251 50	50	60	54	4				
6 2:50	0.34	0.73	367.992	217 249 252 49	50	60	55	4				
6 2:55	0.25	0.73	370.6	217 250 251 51	51	51	60	55				
7 3:00				End	372.704							

Impinger Data (vol)		
#	Initial	Final
1	0	
2	100	
3	100	
4	17	
5	36	
6		

Silica Gel Data (gm)		
#	Initial	Final
1		
2		

Moisture Gain		
	ml.	gm
Total		

Filter Data		
#	Number	Tare
1		
2		
3		

Molecular Weight Data (%)		
#	O <sub>2</sub>	CO <sub>2</sub>
1	15.6	3.5
2		
3		
Avg		



Sample Train Recovery Data Sheet

Client GENERAL DYNAMICS Location CARTHAGE, MO Source BLDG #6 EXMUM Method M23 Date 11/20/2013

Run # 1

	Final ml or gm	Initial ml or gm	Net Gain	
Impinger #1		519.2		Filter #1 <u>D/F</u>
Impinger #2		769.4		Filter #2
Impinger #3		756.0		Filter #3
Impinger #4		624.6		XAD # 8
Impinger #5		893.0		
Impinger #6				Run Start Time
Impinger #7				Run End Time
Impinger #8				Recovery Technician <u>BAG</u>
	Total Gain	<u>void</u>	ml/gm	

Run # 2

	Final ml or gm	Initial ml or gm	Net Gain	
Impinger #1	1115.4	503.0	612.4	Filter #1 <u>D/F</u>
Impinger #2	786.6	786.2	0.4	Filter #2
Impinger #3	755.2	754.8	0.4	Filter #3
Impinger #4	673.4	(6) 642.40 671.9	1.5	XAD # 6
Impinger #5	864.0	835.4	28.6	
Impinger #6				Run Start Time
Impinger #7				Run End Time
Impinger #8				Recovery Technician
	Total Gain	<u>643.3</u>	ml/gm	

Run # \_\_\_\_\_

	Final ml or gm	Initial ml or gm	Net Gain	
Impinger #1	1129.6	519.7	610.1	Filter #1 <u>D/F</u>
Impinger #2	769.4	770.8	-1.4	Filter #2
Impinger #3	757.0	757.4	-0.4	Filter #3
Impinger #4	627.9	625.2	2.7	XAD # 5
Impinger #5	932.4	901.8	30.6	
Impinger #6				Run Start Time
Impinger #7				Run End Time
Impinger #8				Recovery Technician
	Total Gain	<u>641.4</u>	ml/gm	

Sample Train Recovery Data Sheet

Client GENERAL DYNAMICS Location CORPORATE HQ Source BED #6 Exhaust Method M 23 Date 11/21/13

Run # 4

	Final ml or gm	Initial ml or gm	Net Gain	
Impinger #1	<u>1126.2</u>	<u>503.8</u>	<u>616.4</u>	Filter #1 <u>D/F</u>
Impinger #2	<u>703.4</u>	<u>782.6</u>	<u>0.8</u>	Filter #2 _____
Impinger #3	<u>758.2</u>	<u>758.2</u>	<u>0.0</u>	Filter #3 _____
Impinger #4	<u>674.0</u>	<u>622.8</u>	<u>1.2</u>	XAO #4
Impinger #5	<u>868.9</u>	<u>835.4</u>	<u>28.0</u>	Run Start Time _____
Impinger #6	_____	_____	_____	Run End Time _____
Impinger #7	_____	_____	_____	Recovery Technician _____
Impinger #8	_____	_____	_____	_____
	Total Gain		<u>646.4</u> ml/gm	

Run # \_\_\_\_\_

	Final ml or gm	Initial ml or gm	Net Gain	
Impinger #1	_____	_____	_____	Filter #1 _____
Impinger #2	_____	_____	_____	Filter #2 _____
Impinger #3	_____	_____	_____	Filter #3 _____
Impinger #4	_____	_____	_____	Run Start Time _____
Impinger #5	_____	_____	_____	Run End Time _____
Impinger #6	_____	_____	_____	Recovery Technician _____
Impinger #7	_____	_____	_____	_____
Impinger #8	_____	_____	_____	_____
	Total Gain		ml/gm	

Run # \_\_\_\_\_

	Final ml or gm	Initial ml or gm	Net Gain	
Impinger #1	_____	_____	_____	Filter #1 _____
Impinger #2	_____	_____	_____	Filter #2 _____
Impinger #3	_____	_____	_____	Filter #3 _____
Impinger #4	_____	_____	_____	Run Start Time _____
Impinger #5	_____	_____	_____	Run End Time _____
Impinger #6	_____	_____	_____	Recovery Technician _____
Impinger #7	_____	_____	_____	_____
Impinger #8	_____	_____	_____	_____
	Total Gain		ml/gm	

## *Equipment Calibration Data*

**Reference Method Manual Equipment  
Pretest Calibrations, Verifications, and Checks**

# METHOD 5 DRY GAS METER CALIBRATION USING CRITICAL ORIFICES



- 1) Select three critical orifices to calibrate the dry gas meter which bracket the expected operating range.
- 2) Record barometric pressure before and after calibration procedure.
- 3) Run at tested vacuum (from Orifice Calibration Report), for a period of time necessary to achieve a minimum total volume of 5 cubic feet.
- 4) Record data and information in the GREEN cells, YELLOW cells are calculated.

DATE: 1/4/2013		METER SERIAL #: 7		BAROMETRIC PRESSURE (in Hg): 28.2		INITIAL		FINAL		AVG (P <sub>bar</sub> )									
METER PART #: MB-7		CRITICAL ORIFICE SET SERIAL #: 1393																	
ORIFICE #	RUN #	K' FACTOR (AVG)	TESTED VACUUM (in Hg)	DGM READINGS (FT <sup>3</sup> )		TEMPÉRATURES °F				ELAPSED TIME (MIN)	DGM ΔH (in H <sub>2</sub> O)	(1) V <sub>m</sub> (STD)	(2) V <sub>cr</sub> (STD)	(3) Y	Y % DIFF to Average Y	Y % DIFF with other orifices	ΔH <sub>g</sub>		
		INITIAL	FINAL	NET (V <sub>m</sub> )		AMBIENT	DGM INLET (INITIAL FINAL)	DGM OUTLET (INITIAL FINAL)	DGM AVG										
11	1	0.306				.0				0									
	2	0.306	20	205.413	210.483	6.070	69	60	64	60	62	61.5	13.00	0.51	5.0171	5.0518	1.007	1.88	
	3	0.306				.0						0					Avg = 1.007	-1.44	-1.01
16	1	0.4268				.0						0							
	2	0.4268	19	210.483	217.503	7.020	60	64	65	62	64	63.75	13.00	1.1	6.9271	7.0461	1.017	2.08	
	3	0.4268				.0						0					Avg = 1.017	-0.43	1.02
18	1	0.4961				.0						0							
	2	0.4961	18	217.503	225.556	8.053	69	66	67	64	65	65.5	13.00	1.4	7.9259	8.1902	1.033	1.95	
	3	0.4961				.0						0					Avg = 1.033	1.15	1.59
26	1	0.7131				.0						0							
	2	0.7131	17	225.556	237.255	11.699	69	67	69	66	66	66.75	13.00	3	11.6332	11.7727	1.021	2.03	
	3	0.7131				.0						0					Avg = 1.021	-0.08	-0.68
31	1	0.8358				.0						0							
	2	0.8358	16	237.255	250.835	13.580	69	69	69	66	67	67.75	13.00	4.1	13.3989	13.7384	1.030	2.02	
	3	0.8358				.0						0					Avg = 1.030	0.80	0.89

### USING THE CRITICAL ORIFICES AS CALIBRATION STANDARDS:

The following equations are used to calculate the standard volumes of air passed through the DGM, V<sub>m</sub> (std), and the critical orifice, V<sub>cr</sub> (std), and the DGM calibration factor, Y. These equations are automatically calculated in the spreadsheet above.

AVERAGE DRY GAS METER CALIBRATION FACTOR, Y = 1.022

AVERAGE ΔH<sub>g</sub> = 1.99

$$(1) \quad V_{m(\Delta H)} = K' \cdot V_m = \frac{P_{bar} + (\Delta H / 13.6)}{T_m}$$

= Net volume of gas sample passed through DGM, corrected to standard conditions  
 $K' = 17.64 \text{ "R/in. Hg (English), } 0.3858 \text{ "K/mm Hg (Metric)}$   
 $T_m = \text{Absolute DGM avg. temperature ("R - English, "K - Metric)}$

$$(2) \quad V_{cr(\Delta H)} = K' \cdot \frac{P_{bar} \cdot \Theta}{\sqrt{T_{amb}}}$$

= Volume of gas sample passed through the critical orifice, corrected to standard conditions  
 $T_{amb} = \text{Absolute ambient temperature ("R - English, "K - Metric)}$   
 $K' = \text{Average K' factor from Critical Orifice Calibration}$

$$(3) \quad Y = \frac{V_{cr(\Delta H)}}{V_{m(\Delta H)}}$$

= DGM calibration factor

$$\Delta H_g = \left( \frac{0.75 \cdot \Theta}{V_{cr(\Delta H)}} \right)^2 \Delta H \left( \frac{V_{cr(\Delta H)}}{V_m} \right)$$



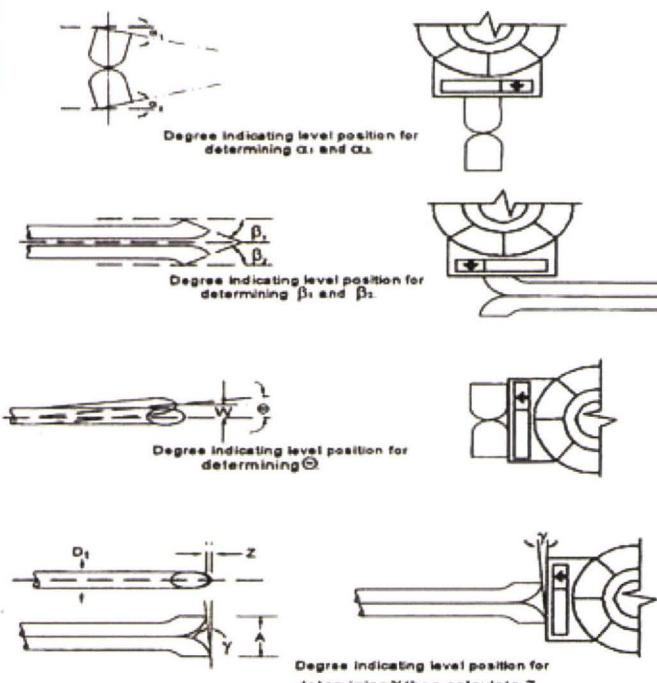
## Initial Sample Probe Calibration Form

Probe ID P5-ADate 01/13/13Technician BPG

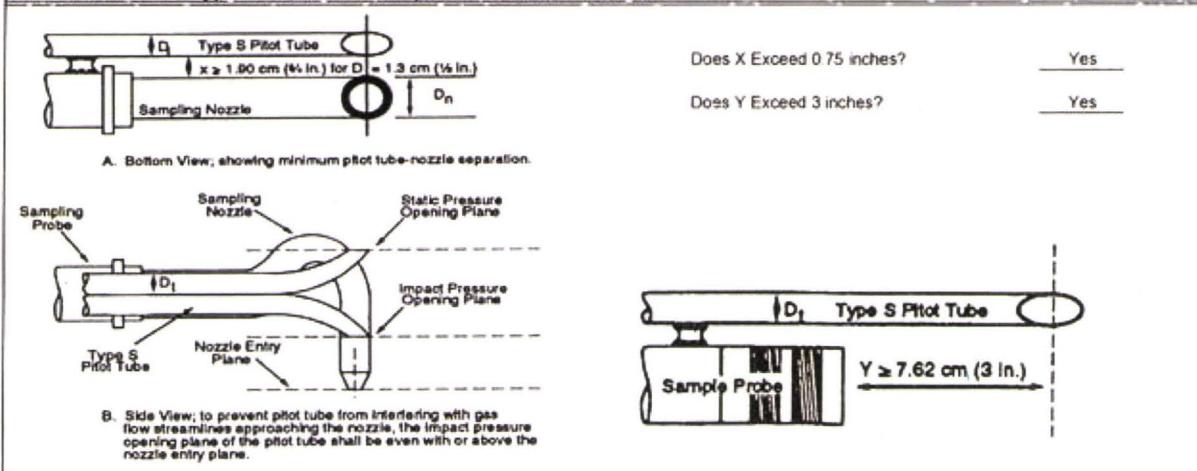
### "S" Type Pitot Calibration

Is the Pitot Level and Perpendicular?	<u>Yes</u>
Is There any Obstruction?	<u>No</u>
Is the Pitot Damaged?	<u>No</u>
$\alpha_1$ ( $-10^\circ = \alpha_1 = +10^\circ$ )	<u>2</u>
$\alpha_2$ ( $-10^\circ = \alpha_2 = +10^\circ$ )	<u>1</u>
$\beta_1$ ( $-5^\circ = \beta_1 = +5^\circ$ )	<u>0</u>
$\beta_2$ ( $-5^\circ = \beta_2 = +5^\circ$ )	<u>1</u>
$\gamma$	<u>0</u>
$\theta$	<u>0</u>
$Z = A \tan \gamma (< 0.125")$	<u>0</u>
$W = A \tan \theta (< 0.03125")$	<u>0</u>
$D_1$ ( $3/16 = D_1 = 3/8"$ )	<u>0.375</u>
A	<u>0.843</u>
$A/D_1$ ( $1.05 = P_A/D_1 = 1.5$ )	<u>1.124</u>

Source: Quality Assurance Handbook for Air Pollution Measurement Systems, Volume III: Stationary Source-Specific Methods  
EPA/600/R-94/038c, September 30, 1994



### Verification of "S" Type Pitot, Thermocouple and Nozzle Placement



### Thermocouple Calibration

	Ice Bath °R				Ambient °R				Boiling Water °R		
	1	2	3		1	2	3		1	2	3
Reference Temp	491	492	492		542	542	542		669	669	668
Thermocouple Temp	493	493	493		541	541	541		669	669	669
Difference (%)	0.4	0.2	0.2		-0.2	-0.2	-0.2		0.0	0.0	0.1

Temperature values must be within 1.5% of reference temperature

I certify that the probe ID P5-A meets or exceeds all specifications, criteria and/or applicable design features and is hereby assigned a pitot tube calibration factor  $C_p$  of 0.84.

Certified By BPGDate 01/13/13





Initial Impinger Outlet Thermocouple Calibration

ID Number	Ice Bath			Ambient			Hot Water Bath			Technician	Date Performed
	Reference Temperature (°Rk)	Thermocouple Temperature (°Rk)	Deviation*	Reference Temperature (°Rk)	Thermocouple Temperature (°Rk)	Deviation*	Reference Temperature (°Rk)	Thermocouple Temperature (°Rk)	Deviation*		
IO-1	492	493	0.2%	524	525	0.2%	669	668	-0.1%	BPG	01/08/13
IO-2	492	493	0.2%	524	524	0.0%	669	669	0.0%	BPG	01/08/13
IO-3	492	493	0.2%	524	525	0.2%	669	669	0.0%	BPG	01/08/13
IO-4	492	493	0.2%	524	525	0.2%	669	670	0.1%	BPG	01/08/13
IO-5	492	493	0.2%	524	526	0.4%	669	668	-0.1%	BPG	01/08/13
IO-6	493	493	0.0%	524	525	0.2%	669	669	0.0%	BPG	01/08/13
IO-8	492	493	0.2%	524	526	0.4%	669	669	0.0%	BPG	01/08/13
IO-10	492	493	0.2%	524	526	0.4%	669	669	0.0%	BPG	01/08/13
IO-11	493	493	0.0%	524	527	0.6%	669	669	0.0%	BPG	01/08/13
IO-12											
IO-15	483	493	0.0%	524	526	0.4%	669	670	0.1%	BPG	01/08/13
G-5	493	493	0.0%	524	526	0.4%	669	670	0.1%	BPG	01/08/13

Reference Thermocouple: Fluke S/N: 83450033 or S/N 90480057 traceable to the United States National Institute of Standards and Technology  
 \*Acceptable Deviation: 1.5%

**Reference Method Manual Equipment  
Post-Test Calibration Checks**

**POST TEST DRY GAS METER CALIBRATION**

DATE: **12/24/2013**

METER BOX #: **7**

TECHNICIAN: **JM**

CRITICAL ORIFICE SET SERIAL #: **1393**

INITIAL                          FINAL                          AVG ( $P_{bar}$ )  
 BAROMETRIC PRESSURE (in Hg): **29.7**                          **29.7**                          **29.7**

ORIFICE #	RUN #	K' FACTOR (AVG)	TESTED VACUUM (in Hg)	DGM READINGS (FT <sup>3</sup> )			TEMPERATURES °F					ELAPSED TIME (MIN)	DGM ΔH (in H <sub>2</sub> O)	(1) $V_m$ (STD)	(2) $V_{cr}$ (STD)	(3) Y	Y VARIATION (%)	$\Delta H_{re}$	
				INITIAL	FINAL	NET ( $V_m$ )	AMBIENT	DGM INLET INITIAL FINAL	DGM OUTLET INITIAL FINAL	DGM AVG									
	1					.0					0								
	2					.0					0								
	3					.0					0								
	18	1	0.4961	18	527.211	535.694	8.483	69.9	61	65	59	61	61.5	13.00	1.3	8.5547	8.3234	0.973	1.80
		2	0.4961	18	535.694	544.042	8.348	69.9	65	67	61	63	64	13.00	1.3	8.3784	8.3234	0.993	1.79
		3	0.4961	18	544.042	552.478	8.434	69.9	67	68	63	63	65.25	13.00	1.3	8.4445	8.3234	0.986	1.79
		1				.0					0								
		2				.0					0								
		3				.0					0								

AVG =

AVG =

AVG =

AVERAGE DRY GAS METER CALIBRATION FACTOR, Y = **0.984**

PRE-DETERMINED DRY GAS METER CALIBRATION FACTOR, Y = **1.022**

PERCENT DIFFERENCE = **-3.7**



O'BRIEN & GERE

Post-Test Sample Probe Calibration Form

Probe ID P5-A

**Visual Inspection**

- |   |          |
|---|----------|
| Do pilot tips appear to be damaged?               | <u>N</u> |
| Do thermocouple wires appear broken or shorted?   | <u>N</u> |
| Do all components appear to be in good condition? | <u>Y</u> |

**Post-Test Thermocouple Calibration**

Reference Temperature °F	Thermocouple Temperature °F	Difference °F
--------------------------	-----------------------------	---------------

67.4

67.8

0.4

Reference Thermocouple: Fluke S/N: 83450003 traceable to the United States National Institute of Standards and Technology

Acceptable Deviation +/- 2 °F

<u>X</u>	Acceptable
_____	Unacceptable

Date 12/10/13

Technician JTG

*Laboratory Reports*

Your Project #: 51076

Site Location: GENERAL DYNAMICS - CARTHAGE, MO

**Attention: Jeff Gorman**

O'Brien & Gere Engineers Inc  
7600 Morgan Rd.  
Liverpool, NY  
USA 13090

Report Date: 2013/12/16

**CERTIFICATE OF ANALYSIS****MAXXAM JOB #: B3K3387**

Received: 2013/11/24, 17:25

Sample Matrix: Stack Sampling Train

# Samples Received: 4

Analyses	Quantity	Date Extracted	Date Analyzed	Laboratory Method	Method Reference
2,3,7,8-TCDF Confirmation (M23)	2	N/A	2013/12/09	BRL SOP-00404	EPA M23/23A
2,3,7,8-TCDF Confirmation (M23)	1	N/A	2013/12/11	BRL SOP-00404	EPA M23/23A
Dioxins/Furans in Air (Method 23)	3	2013/12/03	2013/12/07	BRL SOP-00404	EPA M23/23A
Dioxins/Furans in Air (Method 23)	1	2013/12/03	2013/12/09	BRL SOP-00404	EPA M23/23A

\* RPDs calculated using raw data. The rounding of final results may result in the apparent difference.

**Encryption Key**

Please direct all questions regarding this Certificate of Analysis to your Project Manager.

Clayton Johnson, Project Manager - Air Toxics, Source Evaluation  
Email: CJohnson@maxxam.ca  
Phone# (905) 817-5769

=====

Maxxam has procedures in place to guard against improper use of the electronic signature and have the required "signatories", as per section 5.10.2 of ISO/IEC 17025:2005(E), signing the reports. For Service Group specific validation please refer to the Validation Signature Page.

Total cover pages: 1

Page 1 of 15

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

### EPA M23 DIOXINS AND FURANS (STACK SAMPLING TRAIN)

Maxxam ID		UA7865						
Sampling Date		2013/11/20 00:01			TOXIC EQUIVALENCY	# of		
	Units	RUN 2-M23	EDL	RDL	TEF (2005 WHO)	TEQ(DL)	Isomers	QC Batch
2,3,7,8-Tetra CDD *	pg	5 (1)	2.0	20	1.00	5.00	N/A	3448859
1,2,3,7,8-Penta CDD	pg	11	2.0	20	1.00	11.0	N/A	3448859
1,2,3,4,7,8-Hexa CDD	pg	5	2.0	20	0.100	0.500	N/A	3448859
1,2,3,6,7,8-Hexa CDD	pg	8	2.1	20	0.100	0.800	N/A	3448859
1,2,3,7,8,9-Hexa CDD	pg	13 (2)	1.9	20	0.100	1.30	N/A	3448859
1,2,3,4,6,7,8-Hepta CDD	pg	29	2.2	20	0.0100	0.290	N/A	3448859
1,2,3,4,6,7,8,9-Octa CDD	pg	67	4.1	200	0.000300	0.0201	N/A	3448859
Total Tetra CDD	pg	29	2.0	20	N/A	N/A	N/A	3448859
Total Penta CDD	pg	111	2.0	20	N/A	N/A	N/A	3448859
Total Hexa CDD	pg	79	2.0	20	N/A	N/A	N/A	3448859
Total Hepta CDD	pg	62	2.2	20	N/A	N/A	N/A	3448859
2,3,7,8-Tetra CDF **	pg	107	2.0	20	0.100	10.7	N/A	3448859
1,2,3,7,8-Penta CDF	pg	58	2.1	20	0.0300	1.74	N/A	3448859
2,3,4,7,8-Penta CDF	pg	<90 (3)	90	20	0.300	27.0	N/A	3448859
1,2,3,4,7,8-Hexa CDF	pg	148 (2)	2.0	20	0.100	14.8	N/A	3448859
1,2,3,6,7,8-Hexa CDF	pg	86	1.9	20	0.100	8.60	N/A	3448859
2,3,4,6,7,8-Hexa CDF	pg	<54 (3)	54	20	0.100	5.40	N/A	3448859
1,2,3,7,8,9-Hexa CDF	pg	18	2.2	20	0.100	1.80	N/A	3448859
1,2,3,4,6,7,8-Hepta CDF	pg	209	1.8	20	0.0100	2.09	N/A	3448859
1,2,3,4,7,8,9-Hepta CDF	pg	62	2.4	20	0.0100	0.620	N/A	3448859
1,2,3,4,6,7,8,9-Octa CDF	pg	136	4.2	200	0.000300	0.0408	N/A	3448859
Total Tetra CDF	pg	515	2.0	20	N/A	N/A	N/A	3448859
Total Penta CDF	pg	736	2.1	20	N/A	N/A	N/A	3448859
Total Hexa CDF	pg	822	2.1	20	N/A	N/A	N/A	3448859
Total Hepta CDF	pg	492	2.1	20	N/A	N/A	N/A	3448859

N/A = Not Applicable

RDL = Reportable Detection Limit

EDL = Estimated Detection Limit

QC Batch = Quality Control Batch

\* CDD = Chloro Dibenzo-p-Dioxin, \*\* CDF = Chloro Dibenzo-p-Furan

TEF = Toxic Equivalency Factor, TEQ = Toxic Equivalency Quotient,

The Total Toxic Equivalency (TEQ) value reported is the sum of Toxic Equivalent Quotients for the congeners tested.

WHO(2005): The 2005 World Health Organization, Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds

(1) EMPC / Ratio - Isotopic ratio adjusted to meet theoretical

(2) EMPC / Merged Peak

(3) EMPC / DPE - Diphenylether interference present caused dibenzofuran detected to become a "non-detect" with an elevated detection limit.



Success Through Science®

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

### EPA M23 DIOXINS AND FURANS (STACK SAMPLING TRAIN)

Maxxam ID		UA7865						
Sampling Date		2013/11/20 00:01			TOXIC EQUIVALENCY	# of		
	Units	RUN 2-M23	EDL	RDL	TEF (2005 WHO)	TEQ(DL)	Isomers	QC Batch
Confirmation 2,3,7,8-Tetra CDF **	pg	33	1.9	20	0.100	3.30	N/A	3451957
TOTAL TOXIC EQUIVALENCY	pg	N/A	N/A	N/A	N/A	84.3	N/A	N/A
<b>Surrogate Recovery (%)</b>								
Confirmation C13-2378 TetraCDF	%	48	N/A	N/A	N/A	N/A	N/A	3451957
C13-1234678 HeptaCDD *	%	116	N/A	N/A	N/A	N/A	N/A	3448859
C13-1234678 HeptaCDF	%	89	N/A	N/A	N/A	N/A	N/A	3448859
C13-123478 HexaCDD	%	102	N/A	N/A	N/A	N/A	N/A	3448859
C13-123478 HexaCDF	%	108	N/A	N/A	N/A	N/A	N/A	3448859
C13-1234789 HeptaCDF	%	102	N/A	N/A	N/A	N/A	N/A	3448859
C13-123678 HexaCDD	%	100	N/A	N/A	N/A	N/A	N/A	3448859
C13-123678 HexaCDF	%	91	N/A	N/A	N/A	N/A	N/A	3448859
C13-12378 PentaCDD	%	118	N/A	N/A	N/A	N/A	N/A	3448859
C13-12378 PentaCDF	%	128	N/A	N/A	N/A	N/A	N/A	3448859
C13-123789 HexaCDF	%	122	N/A	N/A	N/A	N/A	N/A	3448859
C13-23478 PentaCDF	%	101	N/A	N/A	N/A	N/A	N/A	3448859
C13-2378 TetraCDD	%	89	N/A	N/A	N/A	N/A	N/A	3448859
C13-2378 TetraCDF	%	65	N/A	N/A	N/A	N/A	N/A	3448859
C13-Octachlorodibenzo-p-Dioxin	%	66	N/A	N/A	N/A	N/A	N/A	3448859
Cl37-2378 TetraCDD	%	106	N/A	N/A	N/A	N/A	N/A	3448859

N/A = Not Applicable  
RDL = Reportable Detection Limit  
EDL = Estimated Detection Limit  
QC Batch = Quality Control Batch  
\* CDD = Chloro Dibenzo-p-Dioxin, \*\* CDF = Chloro Dibenzo-p-Furan  
TEF = Toxic Equivalency Factor, TEQ = Toxic Equivalency Quotient,  
The Total Toxic Equivalency (TEQ) value reported is the sum of Toxic Equivalent Quotients for the congeners tested.  
WHO(2005): The 2005 World Health Organization, Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

**EPA M23 DIOXINS AND FURANS (STACK SAMPLING TRAIN)**

Maxxam ID		UA7866						
Sampling Date		2013/11/20 00:01			TOXIC EQUIVALENCY	# of		
	Units	RUN 3-M23	EDL	RDL	TEF (2005 WHO)	TEQ(DL)	Isomers	QC Batch
2,3,7,8-Tetra CDD *	pg	7 (1)	3.3	20	1.00	7.00	N/A	3448859
1,2,3,7,8-Penta CDD	pg	12	3.2	20	1.00	12.0	N/A	3448859
1,2,3,4,7,8-Hexa CDD	pg	6	2.1	20	0.100	0.600	N/A	3448859
1,2,3,6,7,8-Hexa CDD	pg	9	2.2	20	0.100	0.900	N/A	3448859
1,2,3,7,8,9-Hexa CDD	pg	14 (2)	1.9	20	0.100	1.40	N/A	3448859
1,2,3,4,6,7,8-Hepta CDD	pg	26	1.6	20	0.0100	0.260	N/A	3448859
1,2,3,4,6,7,8,9-Octa CDD	pg	70	4.3	200	0.000300	0.0210	N/A	3448859
Total Tetra CDD	pg	79	3.3	20	N/A	N/A	N/A	3448859
Total Penta CDD	pg	80	3.2	20	N/A	N/A	N/A	3448859
Total Hexa CDD	pg	123	2.1	20	N/A	N/A	N/A	3448859
Total Hepta CDD	pg	52	1.6	20	N/A	N/A	N/A	3448859
2,3,7,8-Tetra CDF **	pg	<210 (3)	210	20	0.100	21.0	N/A	3448859
1,2,3,7,8-Penta CDF	pg	55	2.3	20	0.0300	1.65	N/A	3448859
2,3,4,7,8-Penta CDF	pg	90	2.4	20	0.300	27.0	N/A	3448859
1,2,3,4,7,8-Hexa CDF	pg	82	1.9	20	0.100	8.20	N/A	3448859
1,2,3,6,7,8-Hexa CDF	pg	83	1.8	20	0.100	8.30	N/A	3448859
2,3,4,6,7,8-Hexa CDF	pg	57	2.1	20	0.100	5.70	N/A	3448859
1,2,3,7,8,9-Hexa CDF	pg	17	2.1	20	0.100	1.70	N/A	3448859
1,2,3,4,6,7,8-Hepta CDF	pg	217	2.1	20	0.0100	2.17	N/A	3448859
1,2,3,4,7,8,9-Hepta CDF	pg	65	2.7	20	0.0100	0.650	N/A	3448859
1,2,3,4,6,7,8,9-Octa CDF	pg	106	3.6	200	0.000300	0.0318	N/A	3448859
Total Tetra CDF	pg	1110	3.4	20	N/A	N/A	N/A	3448859
Total Penta CDF	pg	753	2.4	20	N/A	N/A	N/A	3448859
Total Hexa CDF	pg	890	2.0	20	N/A	N/A	N/A	3448859
Total Hepta CDF	pg	509	2.4	20	N/A	N/A	N/A	3448859

N/A = Not Applicable

RDL = Reportable Detection Limit

EDL = Estimated Detection Limit

QC Batch = Quality Control Batch

\* CDD = Chloro Dibenzo-p-Dioxin, \*\* CDF = Chloro Dibenzo-p-Furan

TEF = Toxic Equivalency Factor, TEQ = Toxic Equivalency Quotient,

The Total Toxic Equivalency (TEQ) value reported is the sum of Toxic Equivalent Quotients for the congeners tested.

WHO(2005): The 2005 World Health Organization, Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds

(1) EMPC / Ratio - Isotopic ratio adjusted to meet theoretical

(2) EMPC / Merged Peak

(3) RT &gt; 3 seconds - PCDD/DF analysis - Peak detected exceeds expected retention time (from internal standard) by greater than 3 seconds.



Success Through Science

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

## EPA M23 DIOXINS AND FURANS (STACK SAMPLING TRAIN)

Maxxam ID		UA7866						
Sampling Date		2013/11/20 00:01			TOXIC EQUIVALENCY	# of		
	Units	RUN 3-M23	EDL	RDL	TEF (2005 WHO)	TEQ(DL)	Isomers	QC Batch
Confirmation 2,3,7,8-Tetra CDF **	pg	38	1.5	20	0.100	3.80	N/A	3451957
TOTAL TOXIC EQUIVALENCY	pg	N/A	N/A	N/A	N/A	81.4	N/A	N/A
<b>Surrogate Recovery (%)</b>								
Confirmation C13-2378 TetraCDF	%	57	N/A	N/A	N/A	N/A	N/A	3451957
C13-1234678 HeptaCDD *	%	117	N/A	N/A	N/A	N/A	N/A	3448859
C13-1234678 HeptaCDF	%	71	N/A	N/A	N/A	N/A	N/A	3448859
C13-123478 HexaCDD	%	100	N/A	N/A	N/A	N/A	N/A	3448859
C13-123478 HexaCDF	%	103	N/A	N/A	N/A	N/A	N/A	3448859
C13-1234789 HeptaCDF	%	100	N/A	N/A	N/A	N/A	N/A	3448859
C13-123678 HexaCDD	%	78	N/A	N/A	N/A	N/A	N/A	3448859
C13-123678 HexaCDF	%	72	N/A	N/A	N/A	N/A	N/A	3448859
C13-12378 PentaCDD	%	72	N/A	N/A	N/A	N/A	N/A	3448859
C13-12378 PentaCDF	%	89	N/A	N/A	N/A	N/A	N/A	3448859
C13-123789 HexaCDF	%	98	N/A	N/A	N/A	N/A	N/A	3448859
C13-23478 PentaCDF	%	97	N/A	N/A	N/A	N/A	N/A	3448859
C13-2378 TetraCDD	%	58	N/A	N/A	N/A	N/A	N/A	3448859
C13-2378 TetraCDF	%	55	N/A	N/A	N/A	N/A	N/A	3448859
C13-Octachlorodibenzo-p-Dioxin	%	66	N/A	N/A	N/A	N/A	N/A	3448859
C137-2378 TetraCDD	%	108	N/A	N/A	N/A	N/A	N/A	3448859

N/A = Not Applicable  
RDL = Reportable Detection Limit  
EDL = Estimated Detection Limit  
QC Batch = Quality Control Batch  
\* CDD = Chloro Dibenzo-p-Dioxin, \*\* CDF = Chloro Dibenzo-p-Furan  
TEF = Toxic Equivalency Factor, TEQ = Toxic Equivalency Quotient,  
The Total Toxic Equivalency (TEQ) value reported is the sum of Toxic Equivalent Quotients for the congeners tested.  
WHO(2005): The 2005 World Health Organization, Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

**EPA M23 DIOXINS AND FURANS (STACK SAMPLING TRAIN)**

Maxxam ID		UA7867						
Sampling Date		2013/11/21 00:01			TOXIC EQUIVALENCY	# of		
	Units	RUN 4-M23	EDL	RDL	TEF (2005 WHO)	TEQ(DL)	Isomers	QC Batch
2,3,7,8-Tetra CDD *	pg	8 (1)	2.1	20	1.00	8.00	N/A	3448859
1,2,3,7,8-Penta CDD	pg	14	2.2	20	1.00	14.0	N/A	3448859
1,2,3,4,7,8-Hexa CDD	pg	7	2.1	20	0.100	0.700	N/A	3448859
1,2,3,6,7,8-Hexa CDD	pg	11	2.2	20	0.100	1.10	N/A	3448859
1,2,3,7,8,9-Hexa CDD	pg	17 (2)	2.0	20	0.100	1.70	N/A	3448859
1,2,3,4,6,7,8-Hepta CDD	pg	38	2.1	20	0.0100	0.380	N/A	3448859
1,2,3,4,6,7,8,9-Octa CDD	pg	62	4.2	200	0.000300	0.0186	N/A	3448859
Total Tetra CDD	pg	49	2.1	20	N/A	N/A	N/A	3448859
Total Penta CDD	pg	137	2.2	20	N/A	N/A	N/A	3448859
Total Hexa CDD	pg	134	2.1	20	N/A	N/A	N/A	3448859
Total Hepta CDD	pg	75	2.1	20	N/A	N/A	N/A	3448859
2,3,7,8-Tetra CDF **	pg	178	2.0	20	0.100	17.8	N/A	3448859
1,2,3,7,8-Penta CDF	pg	70	2.1	20	0.0300	2.10	N/A	3448859
2,3,4,7,8-Penta CDF	pg	<100 (3)	100	20	0.300	30.0	N/A	3448859
1,2,3,4,7,8-Hexa CDF	pg	178 (2)	2.1	20	0.100	17.8	N/A	3448859
1,2,3,6,7,8-Hexa CDF	pg	107	2.0	20	0.100	10.7	N/A	3448859
2,3,4,6,7,8-Hexa CDF	pg	81	2.3	20	0.100	8.10	N/A	3448859
1,2,3,7,8,9-Hexa CDF	pg	23	2.3	20	0.100	2.30	N/A	3448859
1,2,3,4,6,7,8-Hepta CDF	pg	246 (1)	1.9	20	0.0100	2.46	N/A	3448859
1,2,3,4,7,8,9-Hepta CDF	pg	82	2.5	20	0.0100	0.820	N/A	3448859
1,2,3,4,6,7,8-Octa CDF	pg	109	4.1	200	0.000300	0.0327	N/A	3448859
Total Tetra CDF	pg	836	2.0	20	N/A	N/A	N/A	3448859
Total Penta CDF	pg	549	2.2	20	N/A	N/A	N/A	3448859
Total Hexa CDF	pg	997	2.2	20	N/A	N/A	N/A	3448859
Total Hepta CDF	pg	580	2.2	20	N/A	N/A	N/A	3448859

N/A = Not Applicable

RDL = Reportable Detection Limit

EDL = Estimated Detection Limit

QC Batch = Quality Control Batch

\* CDD = Chloro Dibenzo-p-Dioxin, \*\* CDF = Chloro Dibenzo-p-Furan

TEF = Toxic Equivalency Factor, TEQ = Toxic Equivalency Quotient,

The Total Toxic Equivalency (TEQ) value reported is the sum of Toxic Equivalent Quotients for the congeners tested.

WHO(2005): The 2005 World Health Organization, Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds

(1) EMPC / Ratio - Isotopic ratio adjusted to meet theoretical

(2) EMPC / Merged Peak

(3) EMPC / DPE - Diphenylether interference present caused dibenzofuran detected to become a "non-detect" with an elevated detection limit.

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

### EPA M23 DIOXINS AND FURANS (STACK SAMPLING TRAIN)

Maxxam ID		UA7867						
Sampling Date		2013/11/21 00:01			TOXIC EQUIVALENCY	# of		
	Units	RUN 4-M23	EDL	RDL	TEF (2005 WHO)	TEQ(DL)	Isomers	QC Batch
Confirmation 2,3,7,8-Tetra CDF **	pg	42	1.5	20	0.100	4.20	N/A	3451957
TOTAL TOXIC EQUIVALENCY	pg	N/A	N/A	N/A	N/A	104	N/A	N/A
<b>Surrogate Recovery (%)</b>								
Confirmation C13-2378 TetraCDF	%	53	N/A	N/A	N/A	N/A	N/A	3451957
C13-1234678 HeptaCDD *	%	115	N/A	N/A	N/A	N/A	N/A	3448859
C13-1234678 HeptaCDF	%	75	N/A	N/A	N/A	N/A	N/A	3448859
C13-123478 HexaCDD	%	101	N/A	N/A	N/A	N/A	N/A	3448859
C13-123478 HexaCDF	%	104	N/A	N/A	N/A	N/A	N/A	3448859
C13-1234789 HeptaCDF	%	115	N/A	N/A	N/A	N/A	N/A	3448859
C13-123678 HexaCDD	%	101	N/A	N/A	N/A	N/A	N/A	3448859
C13-123678 HexaCDF	%	82	N/A	N/A	N/A	N/A	N/A	3448859
C13-12378 PentaCDD	%	98	N/A	N/A	N/A	N/A	N/A	3448859
C13-12378 PentaCDF	%	123	N/A	N/A	N/A	N/A	N/A	3448859
C13-123789 HexaCDF	%	116	N/A	N/A	N/A	N/A	N/A	3448859
C13-23478 PentaCDF	%	95	N/A	N/A	N/A	N/A	N/A	3448859
C13-2378 TetraCDD	%	78	N/A	N/A	N/A	N/A	N/A	3448859
C13-2378 TetraCDF	%	69	N/A	N/A	N/A	N/A	N/A	3448859
C13-Octachlorodibenzo-p-Dioxin	%	70	N/A	N/A	N/A	N/A	N/A	3448859
Cl37-2378 TetraCDD	%	110	N/A	N/A	N/A	N/A	N/A	3448859

N/A = Not Applicable  
RDL = Reportable Detection Limit  
EDL = Estimated Detection Limit  
QC Batch = Quality Control Batch  
\* CDD = Chloro Dibenzo-p-Dioxin, \*\* CDF = Chloro Dibenzo-p-Furan  
TEF = Toxic Equivalency Factor, TEQ = Toxic Equivalency Quotient,  
The Total Toxic Equivalency (TEQ) value reported is the sum of Toxic Equivalent Quotients for the congeners tested.  
WHO(2005): The 2005 World Health Organization, Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

**EPA M23 DIOXINS AND FURANS (STACK SAMPLING TRAIN)**

Maxxam ID		UA9381						
Sampling Date		2013/11/21 00:01			TOXIC EQUIVALENCY	# of		
	Units	RB-M23	EDL	RDL	TEF (2005 WHO)	TEQ(DL)	Isomers	QC Batch
2,3,7,8-Tetra CDD *	pg	<2.1	2.1	20	1.00	2.10	N/A	3448859
1,2,3,7,8-Penta CDD	pg	<2.0	2.0	20	1.00	2.00	N/A	3448859
1,2,3,4,7,8-Hexa CDD	pg	<2.1	2.1	20	0.100	0.210	N/A	3448859
1,2,3,6,7,8-Hexa CDD	pg	<2.2	2.2	20	0.100	0.220	N/A	3448859
1,2,3,7,8,9-Hexa CDD	pg	<1.9	1.9	20	0.100	0.190	N/A	3448859
1,2,3,4,6,7,8-Hepta CDD	pg	4 (1)	2.0	20	0.0100	0.0400	N/A	3448859
1,2,3,4,6,7,8,9-Octa CDD	pg	62	4.1	200	0.000300	0.0186	N/A	3448859
Total Tetra CDD	pg	<2.1	2.1	20	N/A	N/A	N/A	3448859
Total Penta CDD	pg	<2.0	2.0	20	N/A	N/A	N/A	3448859
Total Hexa CDD	pg	<2.1	2.1	20	N/A	N/A	N/A	3448859
Total Hepta CDD	pg	7	2.0	20	N/A	N/A	N/A	3448859
2,3,7,8-Tetra CDF **	pg	<2.2	2.2	20	0.100	0.220	N/A	3448859
1,2,3,7,8-Penta CDF	pg	<2.1	2.1	20	0.0300	0.0630	N/A	3448859
2,3,4,7,8-Penta CDF	pg	<2.1	2.1	20	0.300	0.630	N/A	3448859
1,2,3,4,7,8-Hexa CDF	pg	<2.0	2.0	20	0.100	0.200	N/A	3448859
1,2,3,6,7,8-Hexa CDF	pg	<1.9	1.9	20	0.100	0.190	N/A	3448859
2,3,4,6,7,8-Hexa CDF	pg	<2.1	2.1	20	0.100	0.210	N/A	3448859
1,2,3,7,8,9-Hexa CDF	pg	<2.2	2.2	20	0.100	0.220	N/A	3448859
1,2,3,4,6,7,8-Hepta CDF	pg	3 (1)	1.9	20	0.0100	0.0300	N/A	3448859
1,2,3,4,7,8,9-Hepta CDF	pg	<2.4	2.4	20	0.0100	0.0240	N/A	3448859
1,2,3,4,6,7,8,9-Octa CDF	pg	7	4.1	200	0.000300	0.00210	N/A	3448859
Total Tetra CDF	pg	<2.2	2.2	20	N/A	N/A	N/A	3448859
Total Penta CDF	pg	<2.1	2.1	20	N/A	N/A	N/A	3448859
Total Hexa CDF	pg	<2.0	2.0	20	N/A	N/A	N/A	3448859
Total Hepta CDF	pg	6	2.1	20	N/A	N/A	N/A	3448859
TOTAL TOXIC EQUIVALENCY	pg	N/A	N/A	N/A	N/A	6.57	N/A	N/A
Surrogate Recovery (%)								
C13-1234678 HeptaCDD	%	114	N/A	N/A	N/A	N/A	N/A	3448859

N/A = Not Applicable

RDL = Reportable Detection Limit

EDL = Estimated Detection Limit

QC Batch = Quality Control Batch

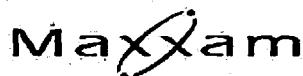
\* CDD = Chloro Dibenzo-p-Dioxin, \*\* CDF = Chloro Dibenzo-p-Furan

TEF = Toxic Equivalency Factor, TEQ = Toxic Equivalency Quotient,

The Total Toxic Equivalency (TEQ) value reported is the sum of Toxic Equivalent Quotients for the congeners tested.

WHO(2005): The 2005 World Health Organization, Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds

(1) EMPC / Ratio - Isotopic ratio adjusted to meet theoretical



Success Through Science®

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

## EPA M23 DIOXINS AND FURANS (STACK SAMPLING TRAIN)

Maxxam ID		UA9381						
Sampling Date		2013/11/21 00:01			TOXIC EQUIVALENCY	# of		
	Units	RB-M23	EDL	RDL	TEF (2005 WHO)	TEQ(DL)	Isomers	QC Batch
C13-1234678 HeptaCDF **	%	78	N/A	N/A	N/A	N/A	N/A	3448859
C13-123478 HexaCDD *	%	103	N/A	N/A	N/A	N/A	N/A	3448859
C13-123478 HexaCDF	%	113	N/A	N/A	N/A	N/A	N/A	3448859
C13-1234789 HeptaCDF	%	118	N/A	N/A	N/A	N/A	N/A	3448859
C13-123678 HexaCDD	%	100	N/A	N/A	N/A	N/A	N/A	3448859
C13-123678 HexaCDF	%	78	N/A	N/A	N/A	N/A	N/A	3448859
C13-12378 PentaCDD	%	114	N/A	N/A	N/A	N/A	N/A	3448859
C13-12378 PentaCDF	%	127	N/A	N/A	N/A	N/A	N/A	3448859
C13-123789 HexaCDF	%	125	N/A	N/A	N/A	N/A	N/A	3448859
C13-23478 PentaCDF	%	104	N/A	N/A	N/A	N/A	N/A	3448859
C13-2378 TetraCDD	%	84	N/A	N/A	N/A	N/A	N/A	3448859
C13-2378 TetraCDF	%	82	N/A	N/A	N/A	N/A	N/A	3448859
C13-Octachlorodibenzo-p-Dioxin	%	70	N/A	N/A	N/A	N/A	N/A	3448859
CI37-2378 TetraCDD	%	108	N/A	N/A	N/A	N/A	N/A	3448859

N/A = Not Applicable

RDL = Reportable Detection Limit

EDL = Estimated Detection Limit

QC Batch = Quality Control Batch

\* CDD = Chloro Dibenzo-p-Dioxin, \*\* CDF = Chloro Dibenzo-p-Furan

TEF = Toxic Equivalency Factor, TEQ = Toxic Equivalency Quotient,

The Total Toxic Equivalency (TEQ) value reported is the sum of Toxic Equivalent Quotients for the congeners tested.

WHO(2005): The 2005 World Health Organization, Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds



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Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

### Test Summary

Maxxam ID UA7865  
Sample ID RUN 2-M23  
Matrix Stack Sampling Train

Collected 2013/11/20  
Shipped  
Received 2013/11/24

Test Description	Instrumentation	Batch	Extracted	Analyzed	Analyst
2,3,7,8-TCDF Confirmation (M23)	HRMS/MS	3451957	N/A	2013/12/09	Vica Cioranic
Dioxins/Furans in Air (Method 23)	HRMS/MS	3448859	2013/12/03	2013/12/07	Owen Cosby

Maxxam ID UA7866  
Sample ID RUN 3-M23  
Matrix Stack Sampling Train

Collected 2013/11/20  
Shipped  
Received 2013/11/24

Test Description	Instrumentation	Batch	Extracted	Analyzed	Analyst
2,3,7,8-TCDF Confirmation (M23)	HRMS/MS	3451957	N/A	2013/12/11	Vica Cioranic
Dioxins/Furans in Air (Method 23)	HRMS/MS	3448859	2013/12/03	2013/12/09	Owen Cosby

Maxxam ID UA7867  
Sample ID RUN 4-M23  
Matrix Stack Sampling Train

Collected 2013/11/21  
Shipped  
Received 2013/11/24

Test Description	Instrumentation	Batch	Extracted	Analyzed	Analyst
2,3,7,8-TCDF Confirmation (M23)	HRMS/MS	3451957	N/A	2013/12/09	Vica Cioranic
Dioxins/Furans in Air (Method 23)	HRMS/MS	3448859	2013/12/03	2013/12/07	Owen Cosby

Maxxam ID UA9381  
Sample ID RB-M23  
Matrix Stack Sampling Train

Collected 2013/11/21  
Shipped  
Received 2013/11/24

Test Description	Instrumentation	Batch	Extracted	Analyzed	Analyst
Dioxins/Furans in Air (Method 23)	HRMS/MS	3448859	2013/12/03	2013/12/07	Owen Cosby



Success Through Solutions

Maxxam Job #: B3K3387  
Report Date: 2013/12/16

O'Brien & Gere Engineers Inc  
Client Project #: 51076  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

**GENERAL COMMENTS**

**Results relate only to the items tested.**

O'Brien &amp; Gere Engineers Inc

Attention: Jeff Gorman

Client Project #: 51076

P.O. #:

Site Location: GENERAL DYNAMICS - CARTHAGE, MO

## Quality Assurance Report

Maxxam Job Number: GB3K3387

QA/QC Batch Num Init	QC Type	Parameter	Date Analyzed yyyy/mm/dd	Value	%Recovery	Units	QC Limits
3448859	OBC	Spiked Blank C13-1234678 HeptaCDD	2013/12/06	149 (1)	%	25 - 130	
		Spiked Blank DUP C13-1234678 HeptaCDD	2013/12/06	120	%	25 - 130	
		Spiked Blank C13-1234678 HeptaCDF	2013/12/06	111	%	25 - 130	
		Spiked Blank DUP C13-1234678 HeptaCDF	2013/12/06	79	%	25 - 130	
		Spiked Blank C13-123678 HexaCDD	2013/12/06	103	%	40 - 130	
		Spiked Blank DUP C13-123678 HexaCDD	2013/12/06	99	%	40 - 130	
		Spiked Blank C13-123678 HexaCDF	2013/12/06	99	%	40 - 130	
		Spiked Blank DUP C13-123678 HexaCDF	2013/12/06	79	%	40 - 130	
		Spiked Blank C13-12378 PentaCDD	2013/12/06	91	%	40 - 130	
		Spiked Blank DUP C13-12378 PentaCDD	2013/12/06	111	%	40 - 130	
		Spiked Blank C13-12378 PentaCDF	2013/12/06	118	%	40 - 130	
		Spiked Blank DUP C13-12378 PentaCDF	2013/12/06	124	%	40 - 130	
		Spiked Blank C13-123789 HexaCDF	2013/12/06	105	%	40 - 130	
		Spiked Blank DUP C13-123789 HexaCDF	2013/12/06	107	%	40 - 130	
		Spiked Blank C13-2378 TetraCDD	2013/12/06	71	%	40 - 130	
		Spiked Blank DUP C13-2378 TetraCDD	2013/12/06	67	%	40 - 130	
		Spiked Blank C13-2378 TetraCDF	2013/12/06	70	%	40 - 130	
		Spiked Blank DUP C13-2378 TetraCDF	2013/12/06	66	%	40 - 130	
		Spiked Blank C13-Octachlorodibenzo-p-Dioxin	2013/12/06	83	%	25 - 130	
		Spiked Blank DUP C13-Octachlorodibenzo-p-Dioxin	2013/12/06	76	%	25 - 130	
		Spiked Blank 2,3,7,8-Tetra CDD	2013/12/06	108	%	80 - 140	
		Spiked Blank DUP 2,3,7,8-Tetra CDD	2013/12/06	110	%	80 - 140	
	RPD	2,3,7,8-Tetra CDD	2013/12/06	1.8	%	20	
		Spiked Blank 1,2,3,7,8-Penta CDD	2013/12/06	108	%	80 - 140	
		Spiked Blank DUP 1,2,3,7,8-Penta CDD	2013/12/06	106	%	80 - 140	
	RPD	1,2,3,7,8-Penta CDD	2013/12/06	1.9	%	20	
		Spiked Blank 1,2,3,4,7,8-Hexa CDD	2013/12/06	111	%	80 - 140	
		Spiked Blank DUP 1,2,3,4,7,8-Hexa CDD	2013/12/06	112	%	80 - 140	
	RPD	1,2,3,4,7,8-Hexa CDD	2013/12/06	0.9	%	20	
		Spiked Blank 1,2,3,6,7,8-Hexa CDD	2013/12/06	103	%	80 - 140	
		Spiked Blank DUP 1,2,3,6,7,8-Hexa CDD	2013/12/06	105	%	80 - 140	
	RPD	1,2,3,6,7,8-Hexa CDD	2013/12/06	1.9	%	20	
		Spiked Blank 1,2,3,7,8,9-Hexa CDD	2013/12/06	110	%	80 - 140	
		Spiked Blank DUP 1,2,3,7,8,9-Hexa CDD	2013/12/06	112	%	80 - 140	
	RPD	1,2,3,7,8,9-Hexa CDD	2013/12/06	1.8	%	20	
		Spiked Blank 1,2,3,4,6,7,8-Hepta CDD	2013/12/06	97	%	80 - 140	
		Spiked Blank DUP 1,2,3,4,6,7,8-Hepta CDD	2013/12/06	131	%	80 - 140	
	RPD	1,2,3,4,6,7,8-Hepta CDD	2013/12/06	NC	%	20	
		Spiked Blank 1,2,3,4,6,7,8,9-Octa CDD	2013/12/06	108	%	80 - 140	
		Spiked Blank DUP 1,2,3,4,6,7,8,9-Octa CDD	2013/12/06	110	%	80 - 140	
	RPD	1,2,3,4,6,7,8,9-Octa CDD	2013/12/06	NC	%	20	
		Spiked Blank 2,3,7,8-Tetra CDF	2013/12/06	95	%	80 - 140	
		Spiked Blank DUP 2,3,7,8-Tetra CDF	2013/12/06	105	%	80 - 140	
	RPD	2,3,7,8-Tetra CDF	2013/12/06	NC	%	20	
		Spiked Blank 1,2,3,7,8-Penta CDF	2013/12/06	108	%	80 - 140	
		Spiked Blank DUP 1,2,3,7,8-Penta CDF	2013/12/06	109	%	80 - 140	
	RPD	1,2,3,7,8-Penta CDF	2013/12/06	0.9	%	20	
		Spiked Blank 2,3,4,7,8-Penta CDF	2013/12/06	112	%	80 - 140	
		Spiked Blank DUP 2,3,4,7,8-Penta CDF	2013/12/06	118	%	80 - 140	
	RPD	2,3,4,7,8-Penta CDF	2013/12/06	5.2	%	20	
		Spiked Blank 1,2,3,4,7,8-Hexa CDF	2013/12/06	111	%	80 - 140	
		Spiked Blank DUP 1,2,3,4,7,8-Hexa CDF	2013/12/06	118	%	80 - 140	
	RPD	1,2,3,4,7,8-Hexa CDF	2013/12/06	6.1	%	20	
		Spiked Blank 1,2,3,6,7,8-Hexa CDF	2013/12/06	101	%	80 - 140	
		Spiked Blank DUP 1,2,3,6,7,8-Hexa CDF	2013/12/06	110	%	80 - 140	

O'Brien & Gere Engineers Inc  
 Attention: Jeff Gorman  
 Client Project #: 51076  
 P.O. #:  
 Site Location: GENERAL DYNAMICS - CARTHAGE, MO

## Quality Assurance Report (Continued)

Maxxam Job Number: GB3K3387

QA/QC Batch Num Init	QC Type	Parameter	Date Analyzed yyyy/mm/dd	Value	%Recovery	Units	QC Limits
3448859 OBC	RPD	1,2,3,6,7,8-Hexa CDF	2013/12/06	8.5		%	20
	Spiked Blank	2,3,4,6,7,8-Hexa CDF	2013/12/06		105	%	80 - 140
	Spiked Blank DUP	2,3,4,6,7,8-Hexa CDF	2013/12/06		129	%	80 - 140
	RPD	2,3,4,6,7,8-Hexa CDF	2013/12/06	20.5 (2)		%	20
	Spiked Blank	1,2,3,7,8,9-Hexa CDF	2013/12/06		122	%	80 - 140
	Spiked Blank DUP	1,2,3,7,8,9-Hexa CDF	2013/12/06		138	%	80 - 140
	RPD	1,2,3,7,8,9-Hexa CDF	2013/12/06	12.3		%	20
	Spiked Blank	1,2,3,4,6,7,8-Hepta CDF	2013/12/06		95	%	80 - 140
	Spiked Blank DUP	1,2,3,4,6,7,8-Hepta CDF	2013/12/06		108	%	80 - 140
	RPD	1,2,3,4,6,7,8-Hepta CDF	2013/12/06	NC		%	20
	Spiked Blank	1,2,3,4,7,8,9-Hepta CDF	2013/12/06		94	%	80 - 140
	Spiked Blank DUP	1,2,3,4,7,8,9-Hepta CDF	2013/12/06		126	%	80 - 140
	RPD	1,2,3,4,7,8,9-Hepta CDF	2013/12/06	NC		%	20
	Spiked Blank	1,2,3,4,6,7,8,9-Octa CDF	2013/12/06		103	%	80 - 140
	Spiked Blank DUP	1,2,3,4,6,7,8,9-Octa CDF	2013/12/06		107	%	80 - 140
	RPD	1,2,3,4,6,7,8,9-Octa CDF	2013/12/06	NC		%	20
	Method Blank	C13-1234678 HeptaCDD	2013/12/07		128	%	25 - 130
		C13-1234678 HeptaCDF	2013/12/07		106	%	25 - 130
		C13-123678 HexaCDD	2013/12/07		112	%	40 - 130
		C13-123678 HexaCDF	2013/12/07		105	%	40 - 130
		C13-12378 PentaCDD	2013/12/07		106	%	40 - 130
		C13-12378 PentaCDF	2013/12/07		116	%	40 - 130
		C13-123789 HexaCDD	2013/12/07		119	%	40 - 130
		C13-2378 TetraCDD	2013/12/07		61	%	40 - 130
		C13-2378 TetraCDF	2013/12/07		61	%	40 - 130
		C13-Octachlorodibenzo-p-Dioxin	2013/12/07		87	%	25 - 130
		2,3,7,8-Tetra CDD	2013/12/07	<2.1, EDL=2.1		pg	
		1,2,3,7,8-Penta CDD	2013/12/07	<2.2, EDL=2.2		pg	
		1,2,3,4,7,8-Hexa CDD	2013/12/07	<2.2, EDL=2.2		pg	
		1,2,3,6,7,8-Hexa CDD	2013/12/07	<2.3, EDL=2.3		pg	
		1,2,3,7,8,9-Hexa CDD	2013/12/07	<2.0, EDL=2.0		pg	
		1,2,3,4,6,7,8-Hepta CDD	2013/12/07	<2.1, EDL=1.9		pg	
		1,2,3,4,6,7,8,9-Octa CDD	2013/12/07	<8, EDL=4.2		pg	
		Total Tetra CDD	2013/12/07	<2.1, EDL=2.1		pg	
		Total Penta CDD	2013/12/07	<2.2, EDL=2.2		pg	
		Total Hexa CDD	2013/12/07	<2.2, EDL=2.2		pg	
		Total Hepta CDD	2013/12/07	<2, EDL=1.9		pg	
		2,3,7,8-Tetra CDF	2013/12/07	<2.1, EDL=2.1		pg	
		1,2,3,7,8-Penta CDF	2013/12/07	<2.0, EDL=2.0		pg	
		2,3,4,7,8-Penta CDF	2013/12/07	<2.1, EDL=2.1		pg	
		1,2,3,4,7,8-Hexa CDF	2013/12/07	<2.0, EDL=2.0		pg	
		1,2,3,6,7,8-Hexa CDF	2013/12/07	<1.8, EDL=1.8		pg	
		2,3,4,6,7,8-Hexa CDF	2013/12/07	<2.1, EDL=2.1		pg	
		1,2,3,7,8,9-Hexa CDF	2013/12/07	<2.1, EDL=2.1		pg	
		1,2,3,4,6,7,8-Hepta CDF	2013/12/07	<1.8, EDL=1.8		pg	
		1,2,3,4,7,8,9-Hepta CDF	2013/12/07	<2.3, EDL=2.3		pg	
		1,2,3,4,6,7,8,9-Octa CDF	2013/12/07	<4.1, EDL=4.1		pg	
		Total Tetra CDF	2013/12/07	<68, EDL=68 (3)		pg	
		Total Penta CDF	2013/12/07	<2.1, EDL=2.1		pg	
		Total Hexa CDF	2013/12/07	<2.0, EDL=2.0		pg	
		Total Hepta CDF	2013/12/07	<2.0, EDL=2.0		pg	
3451957 VCI	Method Blank	Confirmation C13-2378 TetraCDF	2013/12/09		45	%	40 - 135
		Confirmation 2,3,7,8-Tetra CDF	2013/12/09	<1.9, EDL=1.9		pg	

Duplicate: Paired analysis of a separate portion of the same sample. Used to evaluate the variance in the measurement.

Spiked Blank: A blank matrix sample to which a known amount of the analyte, usually from a second source, has been added. Used to evaluate method

O'Brien & Gere Engineers Inc  
Attention: Jeff Gorman  
Client Project #: 51076  
P.O. #:  
Site Location: GENERAL DYNAMICS - CARTHAGE, MO

**Quality Assurance Report (Continued)**

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accuracy.

Method Blank: A blank matrix containing all reagents used in the analytical procedure. Used to identify laboratory contamination.

Surrogate: A pure or isotopically labeled compound whose behavior mirrors the analytes of interest. Used to evaluate extraction efficiency.

NC (RPD): The RPD was not calculated. The level of analyte detected in the parent sample and its duplicate was not sufficiently significant to permit a reliable calculation.

(1) Recovery above method criteria 40% - 130%

No impact on data

(2) Recovery or RPD for this parameter is outside control limits. The overall quality control for this analysis meets acceptability criteria.

(3) EMPC / NDR - Peak detected does not meet ratio criteria and has resulted in an elevated detection limit.

**Validation Signature Page****Maxxam Job #: B3K3387**

The analytical data and all QC contained in this report were reviewed and validated by the following individual(s).



Owen Cosby, BSc.C.Chem, Supervisor, HRMS Services

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Maxxam has procedures in place to guard against improper use of the electronic signature and have the required "signatories", as per section 5.10.2 of ISO/IEC 17025:2005(E), signing the reports. For Service Group specific validation please refer to the Validation Signature Page.

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